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DRAFT
Environmental Impact Report
Hidden Canyon Residences and Preserve
City of Pleasanton, Alameda County, California

State Clearinghouse Number 2019080461

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ACRONYMS AND ABBREVIATIONS

°C	degrees Celsius (Centigrade)
°F	degrees Fahrenheit
µg/m^3	micrograms per cubic meter
AAQS	Ambient Air Quality Standards
AB	Assembly Bill
ABAG	Association of Bay Area Governments
AC Transit	Alameda Contra Costa Transit Authority District
ACE	Altamont Commuter Express
ACFD	Alameda County Fire Department
ACHP	Advisory Council on Historic Preservation
ACM	asbestos-containing material
ACP	Alternative Compliance Plan
ACTC	Alameda County Transportation Commission
ADA	Americans with Disabilities Act
ADT	Average Daily Traffic
ADU	accessory dwelling unit
AFY	acre-feet per year
AIA	Airport Influence Area
AIC	Archaeological Information Center
AICUZ	Air Installation Compatibility Use Zone
AJD	Approved Jurisdictional Determination
Alameda CTC	Alameda County Transportation Commission
ALUC	Airport Land Use Commission
AMSL	above mean sea level
APA	Administrative Procedure Act
APCD	Air Pollution Control District
APE	Area of Potential Effect
APN	Assessor's Parcel Number
AQMD	Air Quality Management District
AQP	Air Quality Plan
ARB	California Air Resources Board
AST	aboveground storage tank
ATCM	Airborne Toxic Control Measures
BAAQMD	Bay Area Air Quality Management District
BAHM	Bay Area Hydrology Model

BART	Bay Area Rapid Transit
BAU	Business as Usual
BCDC	Bay Conservation and Development Commission
BCF	billion cubic feet
BCF/year	billion cubic feet per year
BE	Biological Evaluation
BMP	Best Management Practice
BO	Biological Opinion
BVOC	biogenic volatile organic compound
C^2ES	Center for Climate and Energy Solutions
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
Cal/OSHA	California Occupational Health and Safety Administration
CalEEMod	California Emissions Estimator Model
Cal/EPA	California Environmental Protection Agency
Caltrans	California Department of Transportation
Cal Water	California Water Service
CAP	Climate Action Plan
CARE	Community Air Risk Evaluation
CBC	California Building Standards Code
CCAA	California Clean Air Act
CCCTA	Central Contra Costa Transit Authority
CCR	California Code of Regulations
CCWD	Contra Costa Water District
CDF	California Department of Finance
CDFW	California Department of Fish and Wildlife
CDMG	California Division of Mines and Geology
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act of 1980
CESA	California Endangered Species Act
CFC	chlorofluorocarbon
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH_4	methane
CHL	California Historical Landmarks
CHP	California Highway Patrol

CMP	Congestion Management Plan
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2e	carbon dioxide equivalent
CPHI	California Points of Historical Interest
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CRLF	California red-legged frog
CTP	Countywide Transportation Plan
CTR	California Toxics Rule
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
CZ	Conservation Zone
dB	decibel
dBA	A-weighted decibels
dBA/DD	dBA per each doubling of distance
DBH	diameter at breast height
DDT	dichlorodiphenyltrichloroethane
DMA	drainage management area
DOC	California Department of Conservation
DOT	United States Department of Transportation
DPM	diesel particulate matter
DSRSD	Dublin San Ramon Services District
DTSC	California Department of Toxic Substances Control
du/acre	dwelling units per acre
DWR	California Department of Water Resources
EACCS	East Alameda County Conservation Strategy
EBDA	East Bay Dischargers Authority
EBRPD	East Bay Regional Park District
ECAP	East County Area Plan
EIR	Environmental Impact Report
EISA	Energy Independence and Security Act of 2007
EMP	Emergency Management Plan
EMS	Emergency Medical Services
EOP	Emergency Operations Plan
EPA	United States Environmental Protection Agency

EVA	Emergency Vehicle Access
FAA	Federal Aviation Administration
FAR	floor area ratio
FCS	FirstCarbon Solutions
FEMA	Federal Emergency Management Agency
FGC	Fish and Game Code
FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
GHAD	Geologic Hazard Abatement District
GHG	greenhouse gas
gpcd	gallons per capita per day
gpm	gallons per minute
GPQ	groundwater-pumping quota
GSA	groundwater sustainability agencies
GSP	groundwater sustainability plan
GWh/y	gigawatt-hours per year
GWP	global warming potential
HAP	Hazardous Air Pollutant HCM Highway Capacity Manual
HCP	Habitat Conservation Plan
HESO	Housing Element Sites Overlay
HFC	hydrofluorocarbon
HI	hazard index
HMBP	hazardous materials business plans
HNO_3	nitric acid
HOA	Homeowner's Association
HOV/HOT	High Occupancy Vehicle/High Occupancy Toll
HRA	Health Risk Assessment
HRI	Historical Resources Inventory
HSC	California Health and Safety Code
HVAC	heating, ventilation, and air conditioning
HWCL	Hazardous Waste Control Law
IM	Implementing Measure
in/sec	inches per second
I-580	Interstate 580
ITE	Institute of Transportation Engineers
LAFCo	Local Agency Formation Commission

LAVTA	Livermore Amador Valley Transit Authority
LAVWMA	Livermore-Amador Valley Wastewater Management Agency
LCFS	Low Carbon Fuel Standard
LCI	Governor's Office of Land Use and Climate Innovation
L_{dn}	day/night average sound level
LDR	Low Density Residential
LED	light-emitting diode
L_{eq}	equivalent sound level
LEV	Low-Emission Vehicle
lf	linear feet
LHMP	Local Hazard Mitigation Plan
LID	Low Impact Development
L_{max}	maximum noise/sound level
LOA	Live Oak Associates, Inc.
LOS	Level of Service
LPFD	Livermore-Pleasanton Fire Department
LUST	Leaking Underground Storage Tank
LZ	Lighting Zone
MACT	Maximum Available Control Technology
MBTA	Migratory Bird Treaty Act
MCL	Maximum Contaminant Levels
MCLG	Maximum Contaminant Level Goals
MG	million gallon
mgd	million gallons per day
mg/L	milligram per liter
MM	Mitigation Measure
MMI	Modified Mercalli Intensity
MMP	Mitigation and Monitoring Plan
MMT	million metric ton
mph	miles per hour
MRP	Municipal Regional Stormwater NPDES Permit
MS4	Municipal Separate Storm Sewer System
MSL	mean sea level
MT	metric ton
MTC	Metropolitan Transportation Commission
MTS	Metropolitan Transportation System
MWELO	Model Water Efficient Landscape Ordinance
MWh	megawatt-hour

MXD	mixed-use development
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NCCP	Natural Community Conservation Plan
NDC	nationally determined contributions
NEHRP	National Earthquake Hazards Reduction Program
NEPA	National Environmental Policy Act
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NFIP	National Flood Insurance Program
NGVD	National Geodetic Vertical Datum
NHPA	National Historic Preservation Act
NHTSA	Nat6ioanal Highway Traffic Safety Administration
NO_2	nitrogen dioxide
NO_3	nitrate
NO	nitric oxide
NOAA Fisheries	National Marine Fisheries Service
NOC	Notice of Completion
NOI	Notice of Intent
NOP	Notice of Preparation
NO_x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPDWR	National Primary Drinking Water Regulation
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NTR	National Toxics Rule
O_3	ozone
OAL	Office of Administrative Law
OEHHA	California Office of Environmental Health Hazard Assessment
OES	California Office of Emergency Services
OHWM	ordinary high water mark
ONAC	Office of Noise Abatement and Control
OS-AG	Open Space – Agriculture and Grazing
OS-PH	Open Space – Public Health and Safety
OS-PR	Open Space – Parks and Recreation
OSHA	Occupational Safety and Health Administration
PCB	polychlorinated biphenyl
pCi/L	picocuries per liter
PFAS	per- and polyfluoroalkyl substances

PFBS	perfluorobutanesulfonic acid
PFC	perfluorocarbon
PFHxS	perfluorohexanesulfonic acid
PFNA	perfluorononanoic acid
PFOA	perfluorooctanoic acid
PFOS	perfluorooctanesulphonic acid
PG&E	Pacific Gas and Electric Company
PJD	Preliminary Jurisdictional Determination
PGS	Pleasanton Garbage Service
PM_{10}	particulate matter less than 10 microns in diameter
$PM_{2.}5$	particulate matter less than 2.5 microns in diameter
ppb	parts per billion
PPD	Pleasanton Police Department
ppm	parts per million
ppt	parts per trillion
PPV	peak particle velocity
PRC	Public Resources Code
PRIMMP	Paleontological Resource Impact Mitigation Monitoring Program
PUD	Planned Unit Development
PUD-LDR	Planned Unit Development-Low Density Residential
PUSD	Pleasanton Unified School District
PVC	polyvinyl chloride
RCRA	Resource Conservation and Recovery Act
RDM	Residual Dry Matter
REC	Recognized Environmental Condition
REL	Reference Exposure Level
RHNA	Regional Housing Needs Assessment
RMP	Risk Management Plan
rms	root mean square
ROG	reactive organic gases
RWQCB	Regional Water Quality Control Board
RWTF	Recycled Water Treatment Facility
SARA	Superfund Amendments and Reauthorization Act
SARA Title III	Emergency Planning and Community Right-to-Know Act
SB	Senate Bill
SF_6	sulfur hexafluoride
SFBAAB	San Francisco Bay Area Air Basin
SFPUC	San Francisco Public Utilities Commission

SGMA	Sustainable Groundwater Management Act
SIP	State Implementation Plan
SO_2	sulfur dioxide
SOI	Sphere of Influence
SPCC	Spill Prevention, Control, and Countermeasure
SR	State Route
SRA	State Responsibility Area
SSMP	Sewer System Management Plan
SWPPP	Storm Water Pollution Prevention Plan
State Water Board	California State Water Resources Control Board
TAC	toxic air contaminant
TAZ	Traffic Analysis Zone
TCM	Transportation Control Measure
TDM	Transportation Demand Management
TDS	total dissolved solids
Tg	teragram
therms/y	therms per year
TIS	Transportation Impact Study
TMA	Transportation Management Association
TMDL	Total Maximum Daily Load
TOD	Transit Oriented Development
TPZ	Tree Protection Zone
TVTC	Tri-Valley Transportation Council
UCMP	University of California Museum of Paleontology
UBC	Uniform Building Code
UFC	Uniform Fire Code
UGB	Urban Growth Boundary
UNFCCC	United Nations Framework Convention on Climate Change
USACE	United States Army Corps of Engineers
USDA	United States Department of Agriculture
USDOT	United States Department of Transportation
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	underground storage tank
UWMP	Urban Water Management Plan
V/C	volume to capacity ratio
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled

VOC	volatile organic compounds
WDR	Waste Discharge Requirements
WSA	Water Supply Assessment
WUI	wildland urban interface
WMP	waste management plan
ZEV	Zero-Emission Vehicle
Zone 7	Zone 7 Water Agency

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EXECUTIVE SUMMARY

Purpose

This Draft Environmental Impact Report (Draft EIR) is prepared in accordance with the California Environmental Quality Act (CEQA) to evaluate the potential environmental impacts associated with the implementation of the Hidden Canyon Residences and Preserve Project (proposed project) (State Clearinghouse [SCH] No. 2019080461). This document is prepared in conformance with CEQA (Public Resources Code [PRC] § 21000, *et seq*.) and the CEQA Guidelines (California Code of Regulations [CCR], Title 14, § 15000, *et se*q.).

The purpose of this Draft EIR is to inform decision-makers, representatives of affected and responsible agencies, the public, and other interested parties of the potential environmental effects that may result from implementation of the proposed project. This Draft EIR describes potential impacts relating to a wide variety of environmental issues and methods by which these impacts can be mitigated or avoided.

Project Summary

Project Location

The project site is located in the northwestern portion of the City of Pleasanton. The project site consists of five Assessor's Parcel Numbers (APNs) 941-2500-002, 941-2500-003, 941-2600-002-6, and 941-2700-2, as well as the Oak Hills Congregation Church Site (APN 941-2700-1). The proposed project site is within the City's General Plan area and is also located partially within the northwest portion of the City's Urban Growth Boundary. The project site is roughly bounded by Dublin Canyon Road to the north; Devany Canyon and Creek and the East Bay Regional Park District (EBRPD) land to the west and south; and agricultural lands to the west.

Project Description

The project sponsor, Ponderosa Homes III, Inc., proposes to build 28 new detached single-family residential units and roadways on approximately 23.89 acres of an approximately 130.98-acre project site within the City of Pleasanton. Project implementation would also include the demolition and reconstruction of two existing single-family homes located in the northeastern portion of the development site, dedication of open space, and annexation of a portion of the project site, including the existing Oak Hills Congregation Church Site, into the City of Pleasanton to ensure a logical reorganization of City boundaries.

Project Objectives

The objectives of the proposed project are to:

- Provide a well-designed residential neighborhood with a strong sense of community and connection with adjacent open space;

- Encourage redevelopment of underused sites containing available infrastructure as identified in the Pleasanton General Plan Housing Element;
- Develop a residential community consistent with Measures PP and QQ;
- Provide open space areas across the project site and dedicate land to the EBRPD to be permanently preserved;
- Provide public access, including a public parking/staging area and a trail connection, to Pleasanton Ridge;
- Preserve the open space character at the edges of the City, in accordance with the City of Pleasanton General Plan Community Character Element; and
- Improve Dublin Canyon Road to increase access and safety by constructing roadways, sidewalks, and bike lanes.

Significant Unavoidable Adverse Impacts

The proposed project would result in the following significant unavoidable impacts:

- **Project-Level Vehicle Miles Traveled:** The proposed project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

Summary of Project Alternatives

Below is a summary of the alternatives to the proposed project considered in Section 6, Alternatives to the Proposed Project.

Alternative 1–No Project, No Build

Under the No Project/No Build Alternative (Alternative 1), the proposed project would not be constructed. Instead, it is assumed that under this alternative, existing operations on the project site would continue at the capacity of existing on-site buildings and infrastructure.

Alternative 2–No Project, Existing Zoning

Under the No Project, Existing Zoning Alternative (Alternative 2), the project site would be redeveloped with uses allowed by-right for the existing zoning districts on each parcel. This alternative would not include annexation of the project site into the City. As such, permitted development would be subject to the County's zoning code. On the project site, each parcel is allowed to develop one single-family dwelling unit. Additionally, since APN 941-2600-002 is over 25 acres in size, the development of a secondary dwelling unit is permitted. Thus, this alternative would result in the development of 5 total dwelling units and 1 secondary dwelling unit. No dedication of land to the EBRPD, parking improvements, or improvements to the Oak Hills Congressional Church access would occur.

Alternative 3–Alternative Site

The Alternative Site Alternative (Alternative 3) would utilize a different project site based on the sites identified in the Site Inventory created for the City of Pleasanton 2023-2031 Housing Element. Alternative 3 would include construction of 28 new detached single-family residential units, which is the same amount of housing units as the proposed project, and project operations are assumed to be consistent with those of the proposed project. Based on the proposed unit count, Site 26 – St. Augustine (Site 26) from the City's Site Inventory was selected as the alternative site due to its potential to accommodate the proposed density and the absence of any other entitlement applications submitted for the alternative site. Re-zoning of Site 26 would be required. Because of its location, Alternative 3 would not implement a new public trailhead, traffic signal, water pump, and road improvements. Additionally, this alternative would not include redevelopment of the two existing two single-family homes located on the northeastern portion of the project site, annexation of the 2.5-acre church site, or improvements to parking and access to the church site.

Areas of Controversy

Pursuant to CEQA Guidelines Section 15123(b), a summary section must address areas of controversy known to the lead agency, including issues raised by agencies and the public, and it must also address issues to be resolved, including the choice among alternatives and whether or how to mitigate the significant effects.

A Notice of Preparation (NOP) for the proposed project was issued on August 28, 2019. The NOP describing the original concept for the project and issues to be addressed in the EIR was distributed to the State Clearinghouse, responsible agencies, and other interested parties for a 30-day public review period extending from August 28, 2019, through September 26, 2019. The NOP identified the potential for significant impacts on the environment related to the following topical areas:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural and Tribal Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services
- Recreation
- Transportation
- Utilities and Service Systems
- Wildfire

Disagreement Among Experts

This Draft EIR contains substantial evidence to support all the conclusions presented herein. It is possible that there will be disagreement among various parties regarding these conclusions, although the City of Pleasanton is not aware of any disputed conclusions at the time of this writing. Both the CEQA Guidelines and case law clearly provide the standards for treating disagreement among experts. Where evidence and opinions conflict on an issue concerning the environment, and the lead agency knows of these controversies in advance, the EIR must acknowledge the controversies, summarize the conflicting opinions of the experts, and include sufficient information

to allow the public and decision-makers to make an informed judgment about the environmental consequences of the proposed project.

Potentially Controversial Issues

Below is a list of potentially controversial issues that were raised during the NOP public review period and may be reiterated during the public review and hearing process of this Draft EIR:

- Aesthetic and visual impacts relating to hillsides and nearby viewpoints.
- Loss of agricultural land.
- Stormwater management and deficiencies with existing infrastructure and drainage.
- Transportation impacts concerning safety and road conditions along Dublin Canyon Road, need for traffic calming measures, and bicyclist and pedestrian safety.
- Emergency vehicle access, especially for emergency response and fire evacuation.

It is also possible that evidence will be presented during the 45-day, statutory Draft EIR public review period that may create disagreement. Decision-makers would consider this evidence during the public hearing process.

In rendering a decision on a project where there is disagreement among experts, the decision-makers are not obligated to select the most environmentally preferable viewpoint. Decision-makers are vested with the ability to choose whatever viewpoint is preferable and need not resolve a dispute among experts. In their proceedings, decision-makers must consider comments received concerning the adequacy of the Draft EIR and address any objections raised in these comments. However, decision-makers are not obligated to follow any directives, recommendations, or suggestions presented in comments on the Draft EIR, and can certify the Final EIR without needing to resolve disagreements among experts.

Public Review of the Draft EIR

Upon completion of the Draft EIR, the City of Pleasanton filed a Notice of Completion (NOC) with the State Office of Planning and Research to begin the public review period (PRC § 21161). Concurrent with the NOC, this Draft EIR has been distributed to responsible and trustee agencies, other affected agencies, surrounding cities, and interested parties, as well as all parties requesting a copy of the Draft EIR in accordance with Public Resources Code 21092(b)(3). During the public review period, the Draft EIR, including the technical appendices, is available for review at the City of Pleasonton offices and the City of Pleasanton Library. The address for each location is provided below:

City of Pleasanton, Community and Economic Development Department
City of Pleasanton
200 Old Bernal Avenue
Pleasanton, CA 94566
Hours:
Monday 9:00 a.m.–4:00 p.m.
Tuesday to Thursday, 9:00 a.m.–4:00 p.m.

City of Pleasanton Library
City of Pleasanton
400 Old Bernal Avenue
Pleasanton, CA 94566
Hours:
Monday & Thursday, 10:00 a.m.–6:00 p.m.
Tuesday & Wednesday, 1:00 p.m.–9:00 p.m.
Friday & Saturday, 9:00 a.m.–5:00 p.m.

Agencies, organizations, and interested parties have the opportunity to comment on the Draft EIR during the 45-day public review period. Written comments on this Draft EIR should be addressed to:

Natalie Amos, Associate Planner
City of Pleasanton
Community and Economic Development Department
200 Old Bernal Avenue
Pleasanton, CA 94566
Phone: 925.931.5613
Email: namos@cityofpleasantonca.gov

Submittal of electronic comments in Microsoft Word or Adobe PDF format is encouraged. Upon completion of the public review period, written responses to all significant environmental issues raised will be prepared and made available for review by the commenting agencies at least 10 days prior to the public hearing before the City of Pleasanton on the proposed project, at which the certification of the Final EIR will be considered. Comments received and the responses to comments will be included as part of the record for consideration by decision-makers for the proposed project.

Executive Summary Matrix

Table ES-1 below summarizes the impacts, mitigation measures, and resulting level of significance after mitigation for the relevant environmental issue areas evaluated for the proposed project. The table is intended to provide an overview; narrative discussions for the issue areas are included in the corresponding section of this EIR. Table ES-1 is included in the EIR as required by CEQA Guidelines Section 15123(b)(1).

Table ES-1: Executive Summary Matrix

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Section 3.1—Aesthetics, Light, and Glare			
Impact AES-1: The proposed project would not have a substantial adverse effect on a scenic vista.	Less than significant impact.	None.	Less than significant impact.
Impact AES-2: The proposed project would not damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a state scenic highway.	No impact.	None.	Less than significant impact.
Impact AES-3: The proposed project would not in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from publicly accessible vantage point), and would not conflict with applicable zoning and other regulations governing scenic quality.	Less than significant impact.	None.	Less than significant impact.
Impact AES-4: The proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	Potentially significant impact.	**MM AES-4a: Adhere to Design Review Processes and Standards** As part of the design review process for the proposed project, the applicant shall include the following features in its design review submittal: • Structures facing a public street or neighboring property shall use minimally reflective glass, and other materials and colors used on the exterior of buildings and structures shall be selected with attention to minimizing reflective glare. • Building windows shall be tinted with an anti-reflective material.	Less than significant impact with mitigation incorporated.
Cumulative Impact	Less than significant impact.	None.	Less than significant impact.

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Section 3.2—Air Quality			
Impact AIR-1: The proposed project could conflict with or obstruct implementation of the applicable air quality plan.	Less than significant impact.	None.	Less than significant impact.
Impact AIR-2: The proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard.	Less than significant impact.	None.	Less than significant impact.
Impact AIR-3: The proposed project would not expose sensitive receptors to substantial pollutant concentrations.	Less than significant impact.	None.	Less than significant impact.
Impact AIR-4: The proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	Less than significant impact.	None.	Less than significant impact.
Cumulative Impact	Less than significant impact.	None.	Less than significant impact.
Section 3.3—Biological Resources			
Impact BIO-1: The proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service.	Potentially significant impact.	**MM BIO-1a: Compensation Measures for Condgon's Tarplant** • The project shall compensate for the loss of tarplant on the project development area via the preservation of estimated individuals at a mean ratio of 8:1. However, per the East Alameda County Conservation Strategy (EACCS), mitigation for Congdon's tarplant must also demonstrate habitat enhancement, not just preservation; therefore, a Resource Management Plan (RMP) shall be prepared and implemented, as described	Less than significant impact with mitigation incorporated.

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		below by a qualified Biologist. At a minimum, the RMP shall include the following: Party or parties responsible for implementation of the RMP. • Allowed and prohibited activities on preserved lands. • The locations and types of any fencing, signs and/or displays to be constructed on preserved lands. • A monitoring and management plan for non-native and/or invasive species considered detrimental to protected resources (i.e., weed abatement and invasive species removal). • The types, frequency, and timing of any maintenance activities to be conducted on preserved lands (i.e., litter removal, fence or sign repairs, fire prevention activities such as mowing, etc.). • A grazing and/or mowing component, and requirements of any grazing/mowing plan shall also be included. For grazing, this plan shall include applicable stocking rates (based on the best current information), how other sensitive resources occurring on-site such as riparian habitats will be protected (if necessary) and any monitoring requirements, such as the monitoring of Residual Dry Matter (RDM). A mowing plan shall include timing of mowing activities to best enhance habitat for this species. • A mechanism whereby the RMP shall be funded in perpetuity. Such a mechanism would be the establishment by the	

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		applicant of a non-wasting endowment, funded by the applicant and/or through monthly Homeowner Association (HOA) fees. **MM BIO-1b: Avoidance and Minimization Measures for California Red-legged Frog** *Avoidance and Minimization* • Conduct protocol-level California red-legged frog (CRLF) surveys or assume presence on-site. • Implementation of the following measures, partially summarized below, shall be taken during construction to avoid harm or mortality to individual CRLF. • Conduct protocol-level CRLF surveys or assume presence on the site. • Prior to the start of construction, an approved qualified Biologist will train all construction personnel regarding habitat sensitivity, identification of special-status species, and required practices. • Pre-construction surveys shall be conducted to ensure that CRLF are absent from the construction area. If CRLF are present, they shall be relocated by a qualified Biologist. • The construction zone shall be cleared, and silt fencing shall be erected and maintained around construction zones to prevent CRLF from moving into these areas. • A Biological Monitor shall be present on-site during times of construction, such as	

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		any impacts to the creek, to ensure no CRLF are harmed, injured, or killed during project buildout. *EACCS-specific CRLF Avoidance Minimization Measures:* • If aquatic habitat is present, a qualified Biologist shall stake and flag an exclusion zone prior to activities. The exclusion zone shall be fenced with orange construction zone and erosion control fencing (to be installed by construction crew). The exclusion zone shall encompass the maximum practicable distance from the work site and at least 500 feet from the aquatic feature wet or dry. • A qualified Biologist shall conduct pre-construction surveys prior to construction activities (before groundbreaking). If individuals are found, work shall not begin until they are moved out of the construction zone to a United States Fish and Wildlife Service (USFWS) or California Department of Fish and Wildlife CDFW-) approved relocation site. • A Service-approved Biologist shall be present for initial ground-disturbing activities. • If the work site is within the typical dispersal distance (contact USFWS/CDFW for latest research on this distance for species of interest) of potential breeding habitat, barrier fencing shall be constructed around the worksite to prevent amphibians from entering the	

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		work area. Barrier fencing shall be removed within 72 hours of completion of work. • No monofilament plastic shall be used for erosion control. • Construction personnel shall inspect open trenches in the morning and evening for trapped amphibians. • A qualified Biologist possessing a valid Endangered Species Act Section 10(a)(1)(A) permit or Service approved under an active biological opinion, shall be contracted to trap and to move amphibians to nearby suitable habitat if amphibians are found inside fenced area. • Work shall be avoided within suitable habitat from October 15 (or the first measurable fall rain of 1 inch or greater, to May 1). In addition, the EACCS specifies that a project shall obtain an Incidental Take Permit if occupied habitat is adjacent to the site and suitable habitat is on the project site. *Compensation* The project proposes to preserve in perpetuity approximately 104.6 acres of the project site as open space outside of the grading envelope. This amount of open space would more than sufficiently compensate for any loss of CRLF upland habitat. Additionally, to ensure that mitigation habitat meets or exceeds the	

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		value of the habitat lost to development. Additionally, Focal Species Impact/Mitigation Scoring Sheets, located in Appendix E of the EACCS, were used as part of the assessment for suitability of mitigation lands for CRLF. Standardized mitigation ratios for CRLF, according to Table 3-7 in the EACCS, are 3:1 if the development area is within critical habitat and 2.5:1 if the development area is outside of critical habitat. The vast majority of the development area of the project is outside of critical habitat; therefore, the proposed project is consistent with standardized ratios set forth by the EACCS for this species. An RMP shall be prepared explicitly to manage the proposed open space areas for potentially sensitive species potentially occurring. This plan will be submitted to the City for review and approval. At minimum, this plan should: • Identify approaches to be used and provide evidence that sufficient water budget exist for any proposed enhancement. • Identify a suitable planting regime for restoring or enhancing riparian habitats. • Identify success criteria for monitoring both wetland and riparian habitats that are consistent with similar habitats regionally. • Monitor restored or enhanced riparian habitats for 5 years.	

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		• Define and identify maintenance and management activities to manage open space habitats to meet stated goals of supporting habitat characteristics suitable for CRLF. This would include suitable fencing to control access, limited cattle grazing or other procedures to manage grass height and forage production at levels that benefit CRLF, removal of trash. • Define and provide for a financial mechanism such as a non-wasting endowment or an assessment district that funds open space management into perpetuity. **MM BIO-1c: East Alameda County Conservation Strategy-specific Avoidance and Minimization Measures for Alameda Whipsnake** • No monofilament plastic shall be used for erosion control. • Barrier fencing may be used to exclude focal reptiles. Barrier fencing shall be removed within 72 hours of completion of work. • Construction crews or on-site Biological Monitor shall inspect open trenches in the morning and evening for trapped reptiles. • Ground disturbance in suitable habitat shall be minimized. • A United States Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife- (CDFW-) approved Biological Monitor shall be present for all	

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		ground-disturbing activities in suitable habitat. • A qualified Biologist possessing a valid Endangered Species Act Section 10(a)(1)(A) permit or Service approved under an active biological opinion, and approved by the CDFW shall be contracted to trap and to move reptiles to nearby suitable habitat if listed reptiles are found inside fenced area. *Compensation* Clustering and siting of the project has also allowed for in perpetuity preservation of 104.6 acres of open space of similar habitat quality to the approximately 24 acres that would be impacted by the project. This amount of open space would more than sufficiently compensate for any loss of Alameda whipsnake upland habitat. Additionally, Focal Species Impact/Mitigation Scoring Sheets located in Appendix E of the East Alameda County Conservation Strategy (EACCS) were used as part of the assessment for suitability of mitigation lands for Alameda whipsnake. Standardized mitigation ratios for Alameda whipsnake, according to Table 3-9 in the EACCS, are as follows: 1. If the development area is within critical habitat and the mitigation area is within critical habitat, and both are within the same Recovery Unit (both areas in this case are within Recovery Unit 3) the mitigation ratio is 3:1.	

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		2. If the development area is outside of critical habitat but inside a Recovery Unit and the mitigation area is outside critical habitat but inside the same recovery unit, the mitigation ratio is 3:1. 3. If the development area is outside of critical habitat but inside a Recovery Unit and the mitigation area is inside critical habit and within the same Recovery Unit, 2.5:1. 4. All other types of mitigation would require site-specific agency approval. Areas proposed for preservation by the project would meet the EACCS goals of preserving a mosaic of habitats at an approximate 3:1 ratio, including woodland and upland habitats adjacent to riparian woodlands. The majority of the proposed open space consists of upland habitats (i.e., grasslands). **MM BIO-1d: Mitigation Measures for Golden Eagle, White-tailed Kite, Norther Harrier, and Migratory Birds:** Trees planned for removal shall be removed during nonbreeding season (September 1 through January 31). If it is not possible to avoid tree removal or other disturbances during breeding season (February 1 through August 31), a qualified Biologist shall conduct a pre-construction survey for tree-nesting raptors and other tree- or ground-nesting migratory birds in all trees or other areas of potential nesting habitat within the construction footprint and within 250 feet of	

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		the footprint. This survey shall be conducted no more than 7 days prior to initiation of demolition/construction activities during the early part of breeding season (February 1 through April 30), and no more than 30 days prior to initiation of these activities during the latter part of the breeding season (May 1 through August 31). If nesting raptors or migratory birds are detected on the project site during the survey, a suitable construction-free buffer will be established around all active nests. Precise dimensions of the buffer (up to 250 feet) would be determined at that time and may vary depending on location and species. Buffers will remain in place for the duration of breeding season or until it has been confirmed by a qualified Biologist that all chicks have fledged and are independent of their parents. Pre-construction surveys during nonbreeding season are not necessary, as birds are expected to abandon their roosts during construction activities. Implementation of the above measures would mitigate impacts to tree-nesting raptors and other migratory birds to a less than significant level. *Specific East Alameda County Conservation Strategy Avoidance and Minimization Measures for the golden eagle* Although nesting habitat is marginal on the development site and its proximity, in the unlikely event that an eagle did nest on the project site, the following mitigation would	

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		ensure that the project does not cause nest abandonment. Pre-construction surveys for other nesting birds and raptors shall include a survey for nesting golden eagles to determine their presence or absence within 250 feet of the development footprint. • If an active nest is identified near a proposed work area, work shall be conducted outside of the nesting season (February 1 to September 1). • If an active nest is identified near a proposed work area and work cannot be conducted outside of the nesting season, a no-activity zone shall be established by a qualified Biologist. The no-activity zone will be large enough to avoid nest abandonment and at a minimum will be a 250-feet radius around the nest. • If an effective no-activity zone cannot be established in either case, an experienced golden eagle Biologist will develop a site-specific plan (i.e., a plan that considers the type and extent of the proposed activity, the duration and timing of the activity, the sensitivity and habituation of the eagles, and the dissimilarity of the proposed activity with background activities) to minimize the potential to affect the reproductive success of the eagles. *Compensation* The project proposes to preserve approximately 104.6 acres of the project site outside of the grading envelope as open	

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		space. This amount of open space would more than sufficiently compensate for any loss of golden eagle foraging habitat. Additionally, Focal Species Impact/Mitigation Scoring Sheets located in Appendix E of the EACCS were used as part of the assessment for suitability of mitigation lands for the golden eagle. Standardized mitigation ratios for the golden eagle, according to Table 3-10 in the EACCS, is 3:1 within the East Bay Hills Mitigation Area where the project and associated conservation land are sited. The majority of the area proposed for preservation consists of grassland habitat, although it also includes woodland and riparian woodland habitat. **MM BIO-1e: Avoidance and Minimization Measures for American Badger** Pre-construction surveys conducted for burrowing owls (MM BIO-1i) will also be used to determine presence or absence of badgers within or immediately adjacent to the development footprint. Therefore, the burrowing owl study identified in MM BIO-1i will include American badger. If an active badger den is identified during pre-construction surveys within or immediately adjacent to the construction envelope, a construction-free buffer of up to 300 feet (or other distance specified by California Department of Fish and Wildlife [CDFW]) shall be established around the den. Because badgers are known to use multiple burrows in a breeding burrow complex, a	

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		Biological Monitor shall be present on the project site during construction activities to ensure the buffer is adequate to avoid direct impact to individuals or den abandonment. The monitor would be necessary on the project site until it is determined that any badger young are of an independent age and construction activities would not harm individual badgers. Once it has been determined that badgers have vacated the project site, burrows can be collapsed or excavated and ground disturbance can proceed. Specific Avoidance and Minimization Measures for the badger reported in Table 3-3 of the East Alameda County Conservation Strategy (EACCS) include: • If potential dens are located within the proposed work area and cannot be avoided during construction, qualified Biologist will determine if the dens are occupied or were recently occupied using methodology coordinated with the United States Fish and Wildlife Service (USFWS) and CDFW. • If unoccupied, the qualified Biologist will collapse these dens by hand in accordance with USFWS procedures. Exclusion zones will be implemented following USFWS procedures or the latest USFWS procedures available at the time. The radius of these zones will follow current standards or will be as follows: Potential Den–50 feet; Known Den–100 feet; Natal	

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		or Pupping Den–to be determined on a case-by-case basis in coordination with USFWS and CDFW. • Pipes will be capped and trenches will contain exit ramps to avoid direct mortality while construction areas is active. *Compensation* The project shall permanently protect 104.6 acres as open space, which is considered more than adequate to offset any loss of badger habitat. Additionally, Focal Species Impact/Mitigation Scoring Sheets located in Appendix E of the EACCS were used as part of the assessment for suitability of mitigation lands for the badger. Standardized mitigation ratios for the badger, according to Table 3-10 in the EACCS, is 3:1 within the East Bay Hills Mitigation Area, where the project and associated conservation land are sited. **MM BIO-1f: Mitigation Measure for Crotch's Bumble Bee** A qualified Biologist shall conduct pre-construction surveys with methodology approved by the California Department of Fish and Wildlife (CDFW) during the three stages of Crotch's bumble bee flight period; once a positive identification is made, no further general surveys are necessary; at that point, intensive surveys would occur. The three stages of flight periods include: 1) queen flight after emergence is February–March; 2) highest detection time for nests is	

<table>
<tr><th>Impacts</th><th>Level of Significance Before Mitigation</th><th>Mitigation Measures</th><th>Level of Significance After Mitigation</th></tr>
<tr><td></td><td></td><td>April–August; 3) queens solo flight is September–October when queens find a hibernation area. Surveys will be conducted in the two flight periods prior to the start of construction with two surveys occurring at least 3 weeks apart within each of those flight periods. These surveys will increase the likelihood this species and their underground nests are observed will they be present on the project site. Survey schedules are shown below:
<table>
<tr><th>Construction Date Start</th><th>Required Survey Periods</th><th>Dates of Survey Periods</th></tr>
<tr><td>• Nov–Mar</td><td>• 2 and 3</td><td>• Two surveys April–August
• Two surveys September–Octob</td></tr>
<tr><td>• Apr–Aug</td><td>• 3 and 1</td><td>• Two surveys September–Octob
• Two surveys February–March</td></tr>
<tr><td>• Sept–Oct</td><td>• 1 and 2</td><td>• Two surveys February–March
• Two surveys April–August</td></tr>
</table>
Bumble bees observed shall be photographed and a Global Positioning System (GPS) point taken. If a Crotch’s bumble bee is positively identified, general</td><td></td></tr>
</table>

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		surveys shall stop and intensive surveys will begin. *General Survey Timing* This survey shall be conducted the season prior to the start of work (i.e., if work is expected to start in the late summer, surveys may occur that same year; if work is expected to start in winter or early spring, the surveys shall occur the year before). *Avoidance* Should a Crotch's bumble bee be observed, intensive surveys to locate underground nests shall be conducted. Appropriate weather for intensive surveys is warm and sunny or sunny with some overcast with temperatures between 60° Fahrenheit (degrees Fahrenheit) and 90°. Should an underground nest be located, individuals at the nest shall be photographed to confirm species. If a confirmed underground nest of Crotch's bumble bee is observed, the nest shall be flagged and a 25-foot buffer established around the nest. *Minimization* If a Crotch's bumble bee or a Crotch's bumble bee nest is observed, an avoidance plan would be developed and reviewed by CDFW prior to project work and/or vegetation removal or ground disturbance. *Compensation* If Crotch's bumble bee exists on-site and if take avoidance is not feasible, then a mitigation plan that provides for on- or off-	

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		site compensation shall be completed. The mitigation plan shall provide for a minimum of a 1:1 replacement ratio of suitable habitat. It shall define the location and whether this mitigation is on or off-site, measures to restore and/or enhance existing habitat, management strategies to maintain the conservation value of the habitat into perpetuity, and a funding source for the ongoing management. Compensation may necessitate the need to obtain an Incidental Take Permit from CDFW under the California Endangered Species Act (CESA). If in the end, the Fish and Game Commission chooses to not list the Crotch's bumble bee under CESA, then this would vacate the need to implement the minimization and avoidance methods above. **MM BIO-1g: Mitigation Measure for San Francisco Dusky-Footed Woodrats** *Avoidance and Minimization* A qualified Biologist shall conduct a pre-construction survey for San Francisco dusky-footed woodrat nests no more than 30 days and no less than 14 days prior to the onset of construction activities in or within 50 feet of riparian habitat. This survey timing allows for the scheduling of and deconstruction of any woodrat nests which need relocating. The survey shall encompass all construction zones and surrounding lands within 50 feet. If no woodrat nests are present, no additional measures are required.	

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		A report shall be prepared for submission to the City summarizing the results of the survey which identifies any buffer zones and outlines recommended next steps, including measures implemented to prevent impacts to San Francisco dusky-footed woodrats. *Nest deconstruction* Identified nests shall be avoided, where possible. If avoidance is not possible, as determined by a qualified Biologist in coordination with the applicant, the nest(s) will be manually deconstructed by a qualified Biologist when helpless young are not present, typically during the nonbreeding season (October through January). The nest will be reconstructed in a nearby suitable area. *Construction-free buffers* If it is determined during the pre-construction survey that young may be present, a suitable buffer, delineated with flagging, depending on the timing within the breeding season (ranging from 15–50 feet) will be established around the nest by the qualified Biologist and maintained during construction until the young are independent and have successfully moved from the nest on their own. **MM BIO-1h: Mitigation Measure for Ringtails** *Pre-construction Survey* A qualified Biologist shall conduct pre-construction surveys for the ringtail prior to any disturbance to the property. All suitable	

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		areas within the project site shall be surveyed with walking transects within 2 days prior to the onset of construction. This survey can be conducted in conjunction with other pre-construction surveys. *Tailgate Training* All workers on the project and access corridor shall attend a tailgate training that includes a description of the species, summary of its biology, and minimization measures and instructions on what to do if a ringtail is observed. *Protective Measures for Individuals* In the event an individual is discovered within a construction zone on-site, construction would be halted until the individual self-relocates from the project site. A ringtail would not be expected to be residing within the area of development; therefore, self-relocation is believed to be inevitable. Once the Biologist has determined that the animal has moved outside of potential danger, construction activities could resume. If the ringtail is found to be residing within a construction zone on-site, an appropriate construction-free buffer (to be determined by a qualified Biologist) would be established around the area being used by the ringtail until the nest is abandoned by adult(s) and young for the year (approximately after September). **MM BIO-1i: Avoidance and Minimization Measures for Burrowing Owls**	

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		To avoid potential impacts to active burrowing owl nests and adult owls, a qualified Biologist shall conduct pre-construction surveys for burrowing owls within the construction footprint and within 250 feet of the footprint no more than 7 days prior to project ground disturbance during the early part of breeding season (i.e., February 1 through April 30), and no more than 30 days prior to onset of ground disturbance during any other times of year. These surveys shall be conducted in a manner consistent with accepted burrowing owl survey protocols. Specific Avoidance and Minimization Measures for the burrowing owl are reported in Table 3-3 of the East Alameda County Conservation Strategy (EACCS). These measures are mandatory for mitigation and include: • If an active nest is identified near a proposed work area work will be conducted outside of the nesting season (March 15 to September 1). • If an active nest is identified near a proposed work area and work cannot be conducted outside of the nesting season, a no-activity zone shall be established by a qualified Biologist. The no-activity zone shall be large enough to avoid nest abandonment and will at a minimum, be 250-feet radius from the nest. • If the burrowing owls are present at the project site during the nonbreeding period, a qualified Biologist shall establish a no-activity zone of at least 150 feet.	

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		• If an effective no-activity zone cannot be established in either case, an experienced burrowing owl Biologist shall develop a site-specific plan (i.e., a plan that considers the type and extent of the proposed activity, the duration and timing of the activity, the sensitivity and habituation of the owls, and the dissimilarity of the proposed activity with background activities) to minimize the potential to affect the reproductive success of the owls. *Compensation* To ensure that mitigation habitat meets or exceeds the value of habitat lost to development, Focal Species Impact/Mitigation Scoring Sheets located in Appendix E of the EACCS were used as part of the assessment for suitability of mitigation lands for the burrowing owl. Standardized mitigation ratios for the burrowing owl, according to Table 3-10 in the EACCS, is 3:1 within the East Bay Hills Mitigation Area where the project and associated conservation land is sited.	
Impact BIO-2: The proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service	Significant impact.	Implement MM BIO-3.	Less than significant impact.

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact BIO-3: The proposed project would not have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	Potentially significant impact.	**MM BIO-3: Mitigation Measure for Aquatic/Wetland Habitats** *Minimization* To minimize impacts, measures taken during construction activities shall include placing construction silt fencing around preserved aquatic features and riparian areas to ensure that construction activities do not inadvertently impact these areas. As part of project buildout, all proposed lighting shall be designed to avoid light and glare impacts to preserved riparian corridors. Light sources shall not be visible from riparian areas and will not illuminate riparian areas or cause glare on the opposite side of the channels (e.g., to neighboring properties). Additionally, proposed development activities shall be designed and situated to avoid loss of trees within any riparian areas to the maximum extent practicable. Project construction must setback from the Tree Protection Zone (TPZ) of trees within the riparian area. A TPZ is defined as a circle whose center is within the base of an oak tree, the radius of which is equal to an oak tree's height or 10 feet, whichever is greater. *Compensation* A wetland/riparian Mitigation and Monitoring Plan (MMP) shall be prepared to compensate for a loss of approximately 0.25 acre of seasonal wetlands, 0.06 acre of a Roadside Drainage Ditch, and up to 0.06 acre of the loss of riparian habitat (see Table	Less than significant impact with mitigation incorporated.

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		3 of Appendix C1). The plan shall identify on-site preservation areas having a sufficient water budget (as determined by a Hydrologist) for the creation of seasonal wetland habitat that is of equal or greater quality to the seasonal wetland habitats being impacted at a minimum 2:1 creation:loss. If sufficient areas for the creation of wetland habitat cannot be identified on the preserve area, then the MMP shall include off-site mitigation, preferably within the same watershed, as an alternative strategy. At a minimum, the MMP shall: • Define the location of all created wetlands. • Provide evidence of a suitable water budget to support any created wetland habitats, as determined by a qualified Hydrologist. • Identify species, size, number, and location of plants to be installed. • Identify time of year for planting and any methods for supplemental watering during the establishment period. • Identify the monitoring period for wetlands of no less than 5 years and no less than 10 years for riparian creation/enhancement. • Identify measures that will be monitored, and define incremental and final success criteria that will be required for the wetland mitigation to be deemed a success.	

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		• Identify adaptive management procedures that accommodate uncertainty that comes with wetland creation projects. These include (but are not limited to) measures to address colonization by invasive species, unexpected lack of water, excessive foraging of installed wetland plants by wildlife, etc. • Define management and maintenance activities (weeding, repair of water delivery systems and browsing protection, etc.). • Provide for surety in funding for MMP and for in perpetuity preservation and management of created wetland habitats.	
Impact BIO-4: The proposed project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites.	Less than significant impact.	None.	Less than significant impact.
Impact BIO-5: The proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	Potentially significant impact.	**MM BIO-5: Tree Preservation Plan** For trees to be retained, a tree preservation plan shall be prepared for the project identifying all protection and mitigation measures to be taken. These measures should remain in place for the duration of construction activities at the project site. The following are recommendations for design and construction phases that will assist in successful tree preservation.	Less than significant impact with mitigation incorporated.

		Design recommendations a. Locate the trunk of all trees recommended for preservation that are located within 25 feet of the edge of grading and/or utility installation. Include trunk locations and tree tag numbers on all plans. b. Establish a Tree Protection Zone (TPZ) around each tree to be preserved. For design purposes, the TPZ shall be 3 feet behind the edge of grading. No grading, excavation, construction or storage of materials shall occur within that zone. c. Install protection around all trees to be preserved. No entry is permitted into a TPZ without permission of the Project Superintendent. d. Use only herbicides safe for use around trees and labeled for that use, even below pavement. *Pre-construction and demolition treatments and recommendations:* 1. The demolition contractor shall meet with the Consulting Arborist before beginning work to discuss work procedures and tree protection. 2. Trees to be preserved may require pruning to provide adequate clearance from construction activities. All pruning shall be performed by a licensed State of California contractor possessing the C61 classification license and the D49 specification. All pruning shall adhere to the latest editions of the American National Standards Institute Z133 and A300 standards.	

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		3. Install tree protective fencing at the edge of the TPZ. No grading, construction, installation or other activity is permitted within this area. 4. Stake the edge of grading along the East Bay Regional Park District (EBRPD) access road in order to review impacts to trees. *Tree protection during construction:* 1. Prior to beginning work, contractors working near trees to be preserved shall be required to meet with the Consulting Arborist at the project site to review all work procedures, access routes, storage areas, and tree protection measures. 2. Any grading, construction, demolition or other work that is expected to encounter tree roots shall be monitored by the Consulting Arborist. 3. If injury should occur to any tree during construction, it shall be evaluated as soon as possible by the Consulting Arborist so that appropriate treatments can be applied. 4. Fences have been erected to protect trees to be preserved. Fences shall remain until all site work has been completed. Fences may not be relocated or removed without permission of the Project Superintendent. 5. Construction trailers, traffic, and storage areas shall remain outside fenced areas at all times.	

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		6. No materials, equipment, spoil, waste, or wash-out water may be deposited, stored, or parked within the TPZ (fenced area). 7. Any additional tree pruning needed for clearance during construction shall be performed by a qualified Arborist and not by construction personnel. 8. Any roots damaged during grading or construction shall be exposed to sound tissue and cut cleanly with a saw. *Tree Removal Permit:* The City of Pleasanton requires a permit to remove Heritage Trees. Implementation of the above Mitigation Measures would reduce loss of trees to a less than significant level.	
Impact BIO-6: The proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.	No impact.	None.	No impact.
Cumulative Impact	Potentially significant impact.	Implement BIO-1a through MM BIO-5.	Less than significant impact with mitigation incorporated.
Section 3.4—Cultural Resources and Tribal Cultural Resources			
Impact CUL-1: The proposed project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.	No impact.	None.	No impact.
Impact CUL-2: The proposed project could cause a substantial adverse change in the significance of an	Potentially significant impact.	**MM CUL-2:** The project proponent shall note on any plans that require ground-disturbing excavation that there is a	Less than significant impact with mitigation incorporated.

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
archaeological resource pursuant to Section 15064.5.		potential for exposing buried cultural resources including prehistoric Native American burials. The project proponent shall retain a Professional Archaeologist on an "on-call" basis during ground-disturbing construction for the project to review, identify and evaluate cultural resources that may be inadvertently exposed during construction. The Archaeologist shall review and evaluate any discoveries to determine whether they are historical resource(s) and/or unique archaeological resources under CEQA. If any prehistoric or historic artifacts, or other indication of cultural resources are found once the project construction is underway, all work shall stop within 20-meters (66 feet) of the find. A qualified Archaeologist shall be consulted for an immediate evaluation of the find prior to resuming groundbreaking construction activities within 20 meters of the find. If the find is determined to be an important archaeological resource, the resource shall be either avoided, if feasible, or recovered consistent with the requirements of the California Environmental Quality Act (CEQA) Guidelines.	
Impact CUL-3: The proposed project could disturb human remains, including those interred outside of formal cemeteries.	Less than significant impact.	None.	Less than significant impact.
Impact CUL-4: The proposed project could cause a substantial adverse change in the significance of a	Potentially significant impact.	Implement MM CUL-2 and COA CUL-3.	Less than significant impact.

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Tribal Cultural Resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).			
Impact CUL-5: The proposed project could cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.	Potentially significant impact.	Implement MM CUL-2 and COA CUL-3.	Less than significant impact.
Cumulative Impact	Less than significant impact.	None.	Less than significant impact.
Section 3.5—Energy			
Impact ENER-1: The proposed project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.	Less than significant impact.	None.	Less than significant impact.
Impact ENER-2: The proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.	Less than significant impact.	None.	Less than significant impact.

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Cumulative Impact	Less than significant impact.	None.	Less than significant impact.
Section 3.6—Geology, Soils, and Seismicity			
GEO-1: The proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving: i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. ii) Strong seismic ground shaking. iii) Seismic-related ground failure, including liquefaction. iv) Landslides.	Potentially significant impact.	**MM GEO-1: Design-level Geotechnical Study** Prior to the issuance of any building or grading permits, a design-level geotechnical investigation on the project site and review of detailed site plans shall be performed by a qualified Geotechnical Engineer. The design-level geotechnical investigation could incorporate a variety of field methods and would include (but not be limited to) the following items: • Evaluating the lateral extent and depth of colluvial soils. • Performing a seismic refraction survey to determine shear wave velocities at deeper depths. • Analyzing and developing slope grading and engineered buttress fill design criteria. • Evaluating upslope sources of water. • Evaluating the Site Classification for Seismic Design. • Estimating appropriate minimum building setbacks from the face of fill slopes. The qualified Geotechnical Engineer would be required to demonstrate that implementation of the recommendations would reduce potential impacts associated with liquefaction and landslide potential to below a level of significance in conformance with the standards in the California Building	Less than significant impact with mitigation incorporated.

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		Standards Code (CBC). The applicant would be required to incorporate all recommended design features into project building plans, for review and approval by the City Engineer prior to the issuance of any building or grading permits.	
Impact GEO-2: The proposed project would not result in substantial soil erosion or the loss of topsoil.	Less than significant impact.	None.	Less than significant impact.
Impact GEO-3: The proposed project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.	Potentially significant impact.	Implement MM GEO-1	Less than significant impact.
Impact GEO-4: The proposed project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.	Potentially significant impact.	Implement MM GEO-1	Less than significant impact.
Impact GEO-5: The proposed project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.	No impact.	None.	No impact.
Impact GEO-6: The proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	Potentially significant impact.	**MM GEO-2a:** Prior to the issuance of grading permits, the project proponent/developer shall demonstrate the retention of the services of a qualified professional Paleontologist as defined by the Society of Vertebrate Paleontology (SVP). The qualified Paleontologist shall prepare a Paleontological Resource Impact Mitigation	Less than significant impact with mitigation incorporated.

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		Monitoring Program (PRIMMP). The project proponent/developer shall submit the PRIMMP to and receive approval from the City/Lead Agency. The PRIMMP will describe, in addition to industry standards and SVP standards, the level of monitoring required in the project area, qualifications of the Paleontological monitor for grading operations, and identification of personnel with authority and responsibility to temporarily halt or divert grading equipment to allow for recovery of large specimens. Furthermore, the PRIMMP shall provide direction for any fossil discoveries to be immediately reported, means and methods to be employed to quickly salvage fossils as they are unearthed to avoid construction delays, sampling procedures and protocol for collecting and processing sediments and specimens, fossil identification, and reporting and curation procedures to be employed. The report will include the paleontological records search conducted at the UCMP, pertinent exhibits, maps and reference procedures for reporting of findings. **MM GEO-2b:** On the first day of ground disturbance and prior to the start of any ground-disturbing activities, the qualified professional Paleontologist that meets SVP Standard Procedures shall prepare and conduct a project-wide Worker Environmental Awareness Program (WEAP) training. The WEAP training shall include a review of applicable federal, State, and local	

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		regulations related to paleontological resources; recognition and understanding of significant paleontological resources pertinent to the geography and geology of the region and the types of paleontological resources that may be encountered; procedures to be followed in the event that such resources are encountered; the protocols that apply in the event of inadvertent discovery, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated and any other appropriate protocols. In the event construction crews are phased in, additional training will be conducted for new construction personnel. **MM GEO-2c:** During ground-disturbing construction activities, full time paleontological monitoring shall be conducted by a qualified Paleontological Resource Monitor meeting SVP standards and best practices, under the supervision of the Principal Paleontologist. Monitoring shall be restricted to areas that intrude into the Claremont shale and Monterey formations (i.e., generally below 2 feet) and undisturbed subsurface areas of marine sedimentary rock units of Miocene-age. In the event potentially significant paleontological resources are encountered during ground-disturbing activities, construction-related activities within 50 feet of the find shall stop. No excavation or other disturbances shall occur within the buffer zone until the find has been evaluated by	

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		the project Paleontologist. The Paleontologist shall collect samples of sediments which are likely to contain the remains of small fossil invertebrates, vertebrates, or microfossils. If the resources are found to be significant, protocol for collecting and processing sediments and specimens, as outlined in the Paleontological Resource Impact Mitigation Monitoring Program (PRIMMP), is to be implemented. The Paleontologist shall have the power to temporarily halt or divert grading equipment to allow for removal of abundant or large specimens. If no significant specimens are encountered during ground-disturbing activities, full time monitoring can be reduced to spot-checking or suspended entirely, at the discretion of the qualified professional Paleontologist and the City/Lead Agency. **MM GEO-2d:** The Paleontological Monitor shall keep a daily log and photographic record of all activities involving ground disturbance during the construction phase, as well adhering to the procedures outlined in the Paleontological Resource Impact Mitigation Monitoring Program (PRIMMP). The Monitor's daily activities, findings, etc. shall be submitted to the Principal Paleontologist. All relevant details and findings shall be summarized in a report that shall be prepared at the completion of ground-disturbing activities and submitted to the City/Lead Agency and UCMP repository. Additionally, specimens shall be	

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		identified and curated into a permanent accredited repository (such as the University of California Museum of Paleontology [UCMP]) with permanent curation and retrievable storage.	
Cumulative Impact	Less than significant impact.	None.	Less than significant impact.
Section 3.7—Greenhouse Gas Emissions			
Impact GHG-1: The proposed project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	Less than significant impact.	None.	Less than significant impact.
Impact GHG-2: The proposed project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.	Less than significant impact.	None.	Less than significant impact.
Cumulative Impact	Less than significant impact.	None.	Less than significant impact.
Section 3.8—Hazards and Hazardous Materials			
Impact HAZ-1: The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	Potentially significant impact.	**MM HAZ-1:** The applicant shall retain a licensed professional to conduct asbestos and lead paint surveys. Prior to the issuance of demolition permits for the two existing residences and associated structures, the applicant shall demonstrate removal of any suspect asbestos-containing materials and lead-based paint to the satisfaction of the City.	Less than significant impact.
Impact HAZ-2: The proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment.	Less than significant impact.	None.	Less than significant impact.

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact HAZ-3: The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	Less than significant impact.	None.	Less than significant impact.
Impact HAZ-4: The proposed project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.	Less than significant impact.	None.	Less than significant impact.
Impact HAZ-5: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, the proposed project would not result in a safety hazard or excessive noise for people residing or working the project area.	No impact.	None.	No impact.
Impact HAZ-6: The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	Less than significant impact.	None.	Less than significant impact.
Impact HAZ-7: The proposed project would not expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires.	Less than significant impact.	None.	Less than significant impact.
Cumulative Impact	Less than significant impact.	None.	Less than significant impact.
Section 3.9—Hydrology and Water Quality			
Impact HYD-1: The proposed project would not have the potential to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.	Less than significant impact.	None.	Less than significant impact.

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact HYD-2: The proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.	Less than significant impact.	None.	Less than significant impact.
Impact HYD-3: The proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: i) result in substantial erosion or siltation on- or off-site; (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; (iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or (iv) impede or redirect flood flows.	Less than significant impact.	None.	Less than significant impact.
Impact HYD-4: The proposed project would not be located in a flood hazard zone, tsunami, or seiche zone, or risk release of pollutants due to project inundation.	Less than significant impact.	None.	Less than significant impact.
Impact HYD-5: The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	Less than significant impact.	None.	Less than significant impact.
Cumulative Impact	Less than significant impact.	None.	Less than significant impact.

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Section 3.10—Land Use and Planning			
Impact LAND-1: The proposed project would not physically divide an established community.	Less than significant impact.	None.	Less than significant impact.
Impact LAND-2: The proposed project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.	Less than significant impact.	None.	Less than significant impact.
Cumulative Impact	Less than significant impact.	None.	Less than significant impact.
Section 3.11—Noise			
Impact NOI-1: The project would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	Less than significant impact.	None.	Less than significant impact.
Impact NOI-2: The project would not result in generation of excessive groundborne vibration or groundborne noise levels.	Less than significant impact.	None.	Less than significant impact.
Impact NOI-3: The project would not expose people residing or working in the project area to excessive noise levels for a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport.	No impact.	None.	No impact.
Cumulative Impact	Less than significant impact.	None.	Less than significant impact.
Section 3.12—Public Services			
Impact PUB-1: The proposed project would not result in substantial adverse physical impacts	Less than significant impact.	None.	Less than significant impact.

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection.			
Impact PUB-2: The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection.	Less than significant impact.	None.	Less than significant impact.
Impact PUB-3: The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools.	Less than significant impact.	None.	Less than significant impact.
Impact PUB-4: The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks.	No impact.	None.	No impact.

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact PUB-5: The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities.	Less than significant impact.	None.	Less than significant impact.
Cumulative Impact	Less than significant impact.	None.	Less than significant impact.
Section 3.13—Recreation			
Impact REC-1: The proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.	Less than significant impact.	None.	Less than significant impact.
Impact REC-2: The proposed project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.	Less than significant impact.	None.	Less than significant impact.
Cumulative Impact	Less than significant impact.	None.	Less than significant impact.
Section 3.14—Transportation			
Impact TRANS-1: The proposed project would not conflict with a program plan, ordinance or policy of the circulation system, including transit, roadway, bicycle and pedestrian facilities.	Less than significant impact.	None.	Less than significant impact.
Impact TRANS-2: The proposed project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).	Significant and unavoidable impact.	No feasible mitigation measures.	Significant and unavoidable impact.

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact TRANS-3: The proposed project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	Less than significant impact.	None.	Less than significant impact.
Impact TRANS-4: The proposed project would not result in inadequate emergency access.	Less than significant impact.	None.	Less than significant impact.
Cumulative Impact	Less than significant impact.	None.	Less than significant impact.
Section 3.15—Utilities and Service Systems			
Impact UTIL-1: The proposed project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.	Less than significant impact.	None.	Less than significant impact.
Impact UTIL-2: The proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.	Less than significant impact.	None.	Less than significant impact.
Impact UTIL-3: The proposed project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.	Less than significant impact.	None.	Less than significant impact.
Impact UTIL-4: The proposed project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.	Less than significant impact.	None.	Less than significant impact.

Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact UTIL-5: The proposed project would comply with federal, state, and local statutes and regulations related to solid waste.	Less than significant impact.	None.	Less than significant impact.
Cumulative Impact	Less than significant impact.	None.	Less than significant impact.
Section 3.16—Wildfire			
Impact WILD-1: The proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan.	Less than significant impact.	None.	Less than significant impact.
Impact WILD-2: The proposed project would not due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.	Less than significant impact.	None.	Less than significant impact.
Impact WILD-3: The proposed project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.	Less than significant impact.	None.	Less than significant impact.
Impact WILD-4: The proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.	Potentially significant impact.	Implement MM GEO-1	Less than significant impact.
Cumulative Impact	Less than significant impact.	None.	Less than significant impact.

CHAPTER 1: INTRODUCTION

1.1 - Overview of the CEQA Process

This Draft Environmental Impact Report (Draft EIR) is prepared in accordance with the California Environmental Quality Act (CEQA) to evaluate the potential environmental impacts associated with the implementation of the proposed Hidden Canyon Residences and Preserve (proposed project) (State Clearinghouse [SCH] No. 2019080461). This document is prepared in conformance with CEQA (California Public Resources Code [PRC], § 21000, *et seq*.) and the CEQA Guidelines (California Code of Regulations [CCR], Title 14, § 15000, *et seq*.). This Draft EIR is intended to serve as an informational document for the public agency decision-makers and the public regarding the proposed project.

1.1.1 - Overview

The proposed project is located on a 130-acre site within unincorporated Alameda County, with a portion of the site located within the City of Pleasanton Urban Growth Boundary (UGB). The portion of the project site within the UGB would be annexed into the City and rezoned to facilitate the development of 28 detached single-family residential units and private open space, and redevelopment of two existing single-family homes and private open space on the eastern portion of the project site. Additionally, the existing Oak Hills Congregation Site (APN 941-2700-1) would be annexed into the City, but would continue to operate under existing conditions. Finally, the remaining 58.3 acres of the project site, to the west of the City's UGB, would remain in unincorporated Alameda County, but would be dedicated to the East Bay Regional Parks District (EBRPD) as public open space. Chapter 2, Project Description provides a complete description of the proposed project.

1.1.2 - Purpose and Authority

This Draft EIR provides a project-level analysis of the environmental effects of the proposed project. The environmental impacts of the proposed project are analyzed in the Draft EIR to the degree of specificity appropriate, in accordance with CEQA Guidelines Section 15146. This document addresses the potentially significant adverse environmental impacts that may be associated with the planning, construction, or operation of the proposed project. It also identifies appropriate and feasible mitigation measures and alternatives that may be adopted to significantly reduce or avoid these impacts.

CEQA requires that an EIR contain, at a minimum, certain specific elements. These elements are contained in this Draft EIR and include:

- Table of Contents
- Introduction
- Executive Summary
- Project Description
- Environmental Setting, Significant Environmental Impacts, and Mitigation Measures
- Cumulative Impacts

- Significant Unavoidable Adverse Impacts
- Alternatives to the Proposed Project
- Growth-Inducing Impacts
- Effects Found not to be Significant
- Areas of Known Controversy

1.1.3 - Lead Agency Determination

The City of Pleasanton is designated as the Lead Agency for the proposed project. CEQA Guidelines Section 15367 defines a lead agency as ". . . the public agency, which has the principal responsibility for carrying out or approving a project." Other public agencies may use this Draft EIR in the decision-making or permit process and consider the information in this Draft EIR along with other information that may be presented during the CEQA process.

This Draft EIR was prepared by FirstCarbon Solutions (FCS), an environmental consultant. Prior to public review, it was extensively reviewed and evaluated by the City of Pleasanton. This Draft EIR reflects the independent judgment and analysis of the City of Pleasanton as required by CEQA. Lists of organizations and persons consulted and the report preparation personnel is provided in Chapter 7 of this Draft EIR.

1.2 - Scope of the Draft EIR

This Draft EIR addresses the potential environmental effects of the proposed project. The City of Pleasanton issued a Notice of Preparation (NOP) for the proposed project on August 22, 2019, which circulated between August 22, 2019, and September 23, 2019, for the statutory 30-day public review period. The scope of this Draft EIR includes the potential environmental impacts identified in the NOP and issues raised by agencies and the public in response to the NOP. The NOP is contained in Appendix A of this Draft EIR.

Eight comment letters were received in response to the NOP and additional comments were made at the Public Scoping Meeting held on September 11, 2019 at the City Council Chambers. Comments are listed in Table 1-1 and provided in Appendix A of this Draft EIR.

Table 1-1: NOP Comment Letters

Agency/ Organization	Author	Date	Topics Discussed in Comment Letter	Location Comment is Addressed/Discussed in Draft EIR
Public Agencies				
Native American Heritage Commission (NAHC)	Andrew Green	September 10, 2019	Summarizes CEQA requirements and background information.	N/A
			Summarizes Assembly Bill (AB) 52 and Senate Bill (SB) 18 requirements for	Section 3.4, Cultural Resources and Tribal Cultural Resources

Agency/ Organization	Author	Date	Topics Discussed in Comment Letter	Location Comment is Addressed/Discussed in Draft EIR
			cultural and Tribal cultural resources	
			Provides recommendations for Cultural Resource Assessments (CRAs)	Section 3.4, Cultural Resources and Tribal Cultural Resources
Individuals				
N/A	Amit Raman	March 8, 2019	Request to build a sidewalk along Dublin Canyon Road for pedestrian safety.	Section 3.14, Transportation
			Request to lower the speed limit on Dublin Canyon Road.	Section 3.14, Transportation
			Request to analyze and address stormwater drainage in the project vicinity to reduce flooding.	Section 3.9, Hydrology and Water Quality
N/A	Dena Maionchi	March 10, 2019	Concerns regarding traffic safety at the Dublin Canyon Road and Canyon Meadows Drive intersection.	Section 3.14, Transportation
			Request for the installation of a stoplight or stop sign at the Dublin Canyon Road and Canyon Meadows Drive intersection.	Section 3.14, Transportation
N/A	Russ Shiroma	March 13, 2019	Concerns regarding uninterrupted access to the Oak Hills Congregational Church's property during and after construction.	Section 3.14, Transportation
			Concerns regarding congestion and traffic safety on their property.	Section 3.14, Transportation
N/A	Andrew Gelb	April 1, 2019; April 15, 2019; September 11, 2019 (verbal	Requests for impacts to hillside views from adjacent properties to be analyzed in the Draft EIR.	Section 3.1, Aesthetics, Light, and Glare

Agency/ Organization	Author	Date	Topics Discussed in Comment Letter	Location Comment is Addressed/Discussed in Draft EIR
		comment at Public Scoping Meeting)	Request for three-dimensional visual simulations to show how the proposed project would impact hillside views.	Section 3.1, Aesthetics, Light, and Glare
			Request for careful re-measurements to see how often the prohibition against building on slopes would be enforced.	Section 3.10, Geology and Soils
			Request to see plans for the placement of mature trees throughout and adjacent to the project site.	Chapter 2, Project Description; Section 3.1, Aesthetics, Light, and Glare
			Statement that any trees planted as part of the proposed project should be evergreen.	Chapter 2, Project Description
			Request that the placement of the EBRPD staging area is carefully considered to maximize safety and minimize mischief.	Chapter 2, Project Description
			Request that City staff and Commissioners meet on-site with residents who are concerned about view impacts.	Chapter 1, Introduction; Section 3.1, Aesthetics, Light, and Glare
			Request for plans related to utility pole and wires on the project site, including coordination with PG&E and/or AT&T and any potential undergrounding.	Section 3.15, Utilities and Service Systems
			Request to analyze impacts related to the existing emergency fire road, ensuring that it is maintained and available for emergency use.	Section 3.14, Transportation

Agency/ Organization	Author	Date	Topics Discussed in Comment Letter	Location Comment is Addressed/Discussed in Draft EIR
			Objections to grading and building on protected slopes.	Section 3.10, Geology and Soils
N/A	Bob Devany	September 9, 2019	Spelling correction related to Devany Canyon.	Various Sections
			Request to analyze impacts related to agricultural activities on APN 941-26000-001-03 due to removal of access point.	Chapter 4, Effects Found not to be Significant
N/A	Patty Russell	September 10, 2019	Concerns related to traffic safety on Dublin Canyon Road.	Section 3.14, Transportation
N/A	Christine Buchanan	September 10, 2019	Support for the proposed project related to the number of houses and the dedication of public space to EBRPD.	N/A
			Concern related to traffic and traffic safety on Dublin Canyon Road.	Section 3.14, Transportation
			Suggestion that a traffic light be installed on Dublin Canyon Road.	Section 3.14, Transportation
			Request that a sidewalk be installed along Dublin Canyon Road.	Section 3.14, Transportation
			Request that a bike lane be installed along Dublin Canyon Road.	Section 3.14, Transportation
N/A	Paolo Di Candia	September 11, 2019 (verbal comment)	Concerns regarding water runoff from the project site	Section 3.09, Hydrology and Water Quality
N/A	Diane Lester	September 11, 2019 (verbal comment)	Requested the project be expedited to ensure her mother will see the project to fruition	Addressed by City

Agency/ Organization	Author	Date	Topics Discussed in Comment Letter	Location Comment is Addressed/Discussed in Draft EIR
N/A	Ted Vinson	September 11, 2019 (verbal comment)	Concerns related to the meadow which has been addressed with the change in location of the staging area.	Section 3.1, Aesthetics, Light and Glare
			Concerns related to the fencing proposed for the homes around the lots, stating it would create terrain disfigurement	Section 3.1, Aesthetics, Light and Glare
			Requested a photo montage for the before/after presentation of the landscape with homes and fencing which is part of the Alameda County Agricultural Site Development Review Process.	Section 3.1, Aesthetics, Light and Glare
N/A	Pat Johnson	September 11, 2019 (verbal comment)	Requested information about the wildlife in the project location.	Section 3.3, Biological Resources
			Concerns about which bridges would be widened and not having a left-turn lane for the Canyon Meadows neighborhood, although there is a right-hand lane being proposed.	Section 3.14, Transportation
Source: Compiled by FirstCarbon Solutions (FCS) 2025.				

1.2.1 - Environmental Issues Determined not to be Significant

The NOP identified topical areas that were determined not to be significant. An explanation of why each area is determined not to be significant is provided in Chapter 4, Effects Found not to be Significant. These topical areas are as follows:

- Agriculture and Forestry Resources
- Mineral Resources
- Population and Housing

1.2.2 - Potentially Significant Environmental Issues

The NOP found that the following topical areas may contain potentially significant environmental issues that will require further analysis in the EIR. These sections are as follows:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources and Tribal Cultural Resources
- Energy
- Geology, Soils, and Seismicity
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services
- Recreation
- Transportation
- Utilities and Service Systems
- Wildfire

1.3 - Organization of the Draft EIR

This Draft EIR is organized into the following main sections:

- **Chapter ES: Executive Summary.** This chapter includes a summary of the proposed project and alternatives to be addressed in the Draft EIR. A brief description of the areas of controversy and issues to be resolved, and overview of the Mitigation Monitoring and Reporting Program (MMRP), in addition to a table that summarizes the impacts, mitigation measures, and level of significance after mitigation, are also included in this section.
- **Chapter 1: Introduction.** This chapter provides an introduction and overview describing the purpose of this Draft EIR, its scope and components, and its review and certification process.
- **Chapter 2: Project Description.** This chapter includes a detailed description of the proposed project, including its location, site, and project characteristics. A discussion of the project objectives, intended uses of the Draft EIR, responsible agencies, and approvals that are needed for the proposed project are also provided.
- **Chapter 3: Environmental Impact Analysis.** This chapter analyzes the environmental impacts of the proposed project. Impacts are organized into major topic areas. Each topic area includes a description of the environmental setting, methodology, significance criteria, impacts, mitigation measures, and significance after mitigation. The specific environmental topics that are addressed within Chapter 3 are as follows:

- **Section 3.1—Aesthetics, Light, and Glare:** Addresses the potential visual impacts of development intensification and the overall increase in illumination produced by the proposed project.
- **Section 3.2—Air Quality:** Addresses potential air quality impacts associated with project implementation and emissions of criteria pollutants. In addition, the section also evaluates project emissions of toxic air contaminants.
- **Section 3.3—Biological Resources:** Addresses potential impacts on habitat, vegetation, and wildlife; the potential degradation or elimination of important habitat; and impacts on listed, proposed, and candidate threatened and endangered species.
- **Section 3.4—Cultural Resources and Tribal Cultural Resources:** Addresses potential impacts on historical resources, archaeological resources, paleontological resources, and burial sites.
- **Section 3.5—Energy:** Addresses potential project impacts related to energy usage.
- **Section 3.6—Geology and Soils:** Addresses the potential impacts the project may have on soils and assesses the effects of project development in relation to geologic and seismic conditions.
- **Section 3.7—Greenhouse Gas Emissions:** Addresses potential project emissions of greenhouse gases.
- **Section 3.8—Hazards and Hazardous Materials:** Addresses potential for presence of hazardous materials or conditions on the project site and in the project area that may have the potential to impact human health.
- **Section 3.9—Hydrology and Water Quality:** Addresses the potential impacts of the project on local hydrological conditions, including drainage areas, and changes in the flow rates.
- **Section 3.10—Land Use and Planning:** Addresses the potential land use impacts associated with division of an established community and consistency with relevant land use plans, policies and regulations adopted for the purpose of avoiding or mitigating an environmental impact.
- **Section 3.11—Noise:** Addresses potential noise impacts during construction and at project buildout from mobile and stationary sources. The section also addresses the impact of noise generation on neighboring uses.
- **Section 3.12—Public Services:** Addresses potential impacts upon public services, including fire protection, law enforcement, schools, parks, and recreational facilities.
- **Section 3.13—Recreation:** Addresses potential impacts related to parks and park usage.
- **Section 3.14—Transportation:** Addresses potential impacts related to the local and regional roadway system and public transportation, bicycle, and pedestrian access.
- **Section 3.15—Utilities and Services Systems:** Addresses potential impacts related to service providers, including fire protection, law enforcement, water supply, wastewater, solid waste, and energy providers.
- **Section 3-16—Wildfire:** Addresses potential impacts related to wildfire including lands within State Responsibility Areas and lands classified as very high fire hazard severity zones.

- **Chapter 4: Effects Found not to be Significant.** This chapter contains analysis of the topical sections not addressed in Chapter 3.
- **Chapter 5: Other CEQA Considerations.** This chapter provides a summary of significant environmental impacts, including unavoidable and growth-inducing impacts. This section

discusses the cumulative impacts associated with the proposed project, including the impacts of past, present, and probable future projects. In addition, the proposed project's energy demand is discussed.

- **Chapter 6: Alternatives to the Proposed Project.** This chapter compares the impacts of the proposed project with three land-use project alternatives: Alternative 1, the No Project/No Build Alternative; Alternative 2, the No Project/Existing Zoning Alternative; and Alternative 3, the Alternative Site Alternative. An environmentally superior alternative is identified. In addition, alternatives initially considered but rejected from further consideration are discussed.
- **Chapter 7: Persons and Organizations Consulted/List of Preparers.** This chapter also contains a full list of persons and organizations that were consulted during the preparation of this Draft EIR. This Chapter also contains a full list of the authors who assisted in the preparation of the Draft EIR, by name and affiliation.
- **Appendices.** The Draft EIR appendices includes notices and other procedural documents pertinent to the Draft EIR, as well as all technical material prepared to support the analysis.

1.4 - Documents Incorporated by Reference

As permitted by CEQA Guidelines Section 15150, this Draft EIR has referenced several technical studies, analyses, and previously certified environmental documentation. Information from the documents, which have been incorporated by reference, has been briefly summarized in the appropriate section(s). The relationship between the incorporated part of the referenced document and the Draft EIR has also been described. The documents and other sources that have been used in the preparation of this Draft EIR include but are not limited to:

- Pleasanton General Plan 2005-2025
- City of Pleasanton Municipal Code

In accordance with CEQA Guidelines Section 15150(b), the General Plan, City Municipal Code, and the referenced documents and other sources used in the preparation of the Draft EIR are available for review at the Pleasanton Planning Commission at the address shown in Section 1.6 below.

1.5 - Documents Prepared for the Proposed Project

The following technical studies and analyses were prepared for the proposed project:

- Tree Report (Hort Science | Bartlett Consulting 2020) attached as Appendix C.
- Tree preservation Options Memorandum (Hort Science | Bartlett Consulting 2023) attached as Appendix C.
- Lester and Shriner's Property Biological Evaluation (Live Oak Associated, Inc. 2023) attached as Appendix C.
- Historic Architecture Evaluation Report (Ward Hill 2018) attached as Appendix D.

- Archaeological Resources Assessment Report (Basin Research Associates 2018) attached as Appendix D.
- Geotechnical Response to Comments (Cornerstone Earth Group 2022) attached as Appendix E.
- Update Geotechnical Review (Ninyo & Moore 2025) attached as Appendix E.
- Updated Preliminary Geotechnical & Geologic Report (Cornerstone Earth Group 2020) attached as Appendix E.
- Hidden Canyon Residences & Preserve Transportation Impact Study (TJKM 2023) attached as Appendix I.

1.6 - Review of the Draft EIR

Upon completion of the Draft EIR, the City filed a Notice of Completion (NOC) with the State Office of Planning and Research to begin the public review period (PRC § 21161). Concurrent with the NOC, this Draft EIR has been distributed to responsible and trustee agencies, other affected agencies, surrounding cities, and interested parties, as well as all parties requesting a copy of the Draft EIR in accordance with Public Resources Code 21092(b)(3). During the public review period, the Draft EIR, including the technical appendices, is available for review at the locations below. The address for each location is provided below:

City of Pleasanton
200 Old Bernal Avenue
Pleasanton, CA 94566-0802

The Draft EIR is also available for review at the following website:
https://www.cityofpleasantonca.gov/our-government/community-and-economic-development/short-range-projects/

Agencies, organizations, and interested parties have the opportunity to comment on the Draft EIR during the 45-day public review period. Written comments on this Draft EIR should be addressed to:

Natalie Amos, Associate Planner
City of Pleasanton Community
Development Department
200 Old Bernal Avenue
PO Box 520
Pleasanton, CA 94566
Email: namos@cityofpleasantonca.gov

Submittal of electronic comments in Microsoft Word or Adobe PDF format is encouraged. Upon completion of the public review period, written responses to all significant environmental issues raised will be prepared and made available for review by the commenting agencies at least 10 days prior to the public hearing before the City Council on the proposed project, at which the certification of the Final EIR will be considered. Comments received and the responses to comments will be included as part of the record for consideration by decision makers for the proposed project.

CHAPTER 2: PROJECT DESCRIPTION

The project sponsor, Ponderosa Homes III, Inc., proposes to build 28 new detached single-family residential units and roadways on approximately 23.89 acres (development site) of an approximately 130.98-acre project site within the City of Pleasanton (City). Project implementation would also include the demolition and reconstruction of two existing single-family homes located in the northeastern portion of the development site, dedication of open space, and annexation of a portion of the project site, including the existing Oak Hills Congregation Church Site, into the City to ensure a logical reorganization of City boundaries. The project site consists of seven existing parcels, partially within the Urban Growth Boundary (UGB) of the City of Pleasanton.

This chapter provides an overview of the project location and setting, project objectives, and proposed project details, characteristics, and phasing. It also describes intended uses of the Draft EIR by agencies with permitting and approval authority over the proposed project, as well as required permits and approvals.

2.1 - Project Location and Setting

2.1.1 - Regional Location

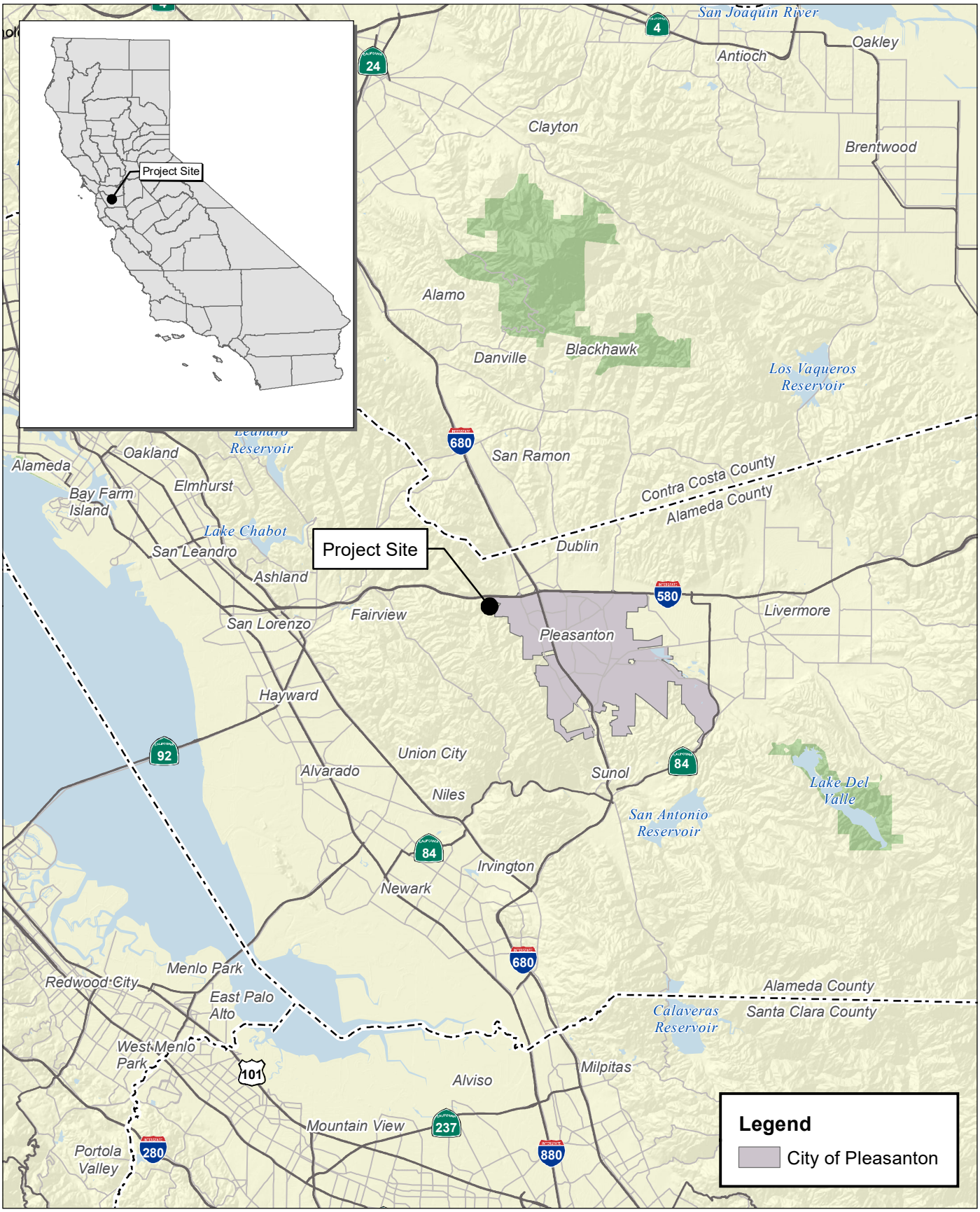
The City of Pleasanton is located in the eastern San Francisco Bay Area of California. The City is bordered to the south, southwest, and west by Pleasanton Ridge Regional Park; northwest by unincorporated Alameda County; north by the City of Dublin; and east by the City of Livermore (Exhibit 2-1). Located in central Alameda County, the incorporated city limits of Pleasanton cover 22.4 square miles (14,300 acres).[1,2] Historically, the City has been a suburban residential community, serving major employment centers to the northwest (City of San Francisco) and southwest (City of San José). Major roadway networks provide regional access to the surrounding areas, including Interstate 580 (I-580) running east–west across the City's northern boundary and I-680, running north–south through the western portion of the City.

2.1.2 - Local Setting

As shown in Exhibit 2-1, the project site is located in the northwestern portion of the City of Pleasanton. As shown in Exhibit 2-2a through Exhibit 2-2b, the proposed project site is within the City's General Plan area and is also located partially within the northwest portion of the City's UGB. The Pleasanton Sphere of Influence (SOI), which signifies the probable ultimate physical boundary and service area of the City, includes 42.2 square miles (27,200 acres). The Alameda County Local Agency Formation Commission (LAFCo) has adopted the SOI. The SOI includes lands incorporated within the city limits, as well as unincorporated land over which Alameda County has zoning and land use authority. The boundary delineates the areas appropriate for urban development and excludes open space areas.

[1] California Governor's Office of Planning and Research (OPR). 2003. State of California, General Plan Guidelines.
[2] City of Pleasanton. 2009. City of Pleasanton General Plan 2005–2025.

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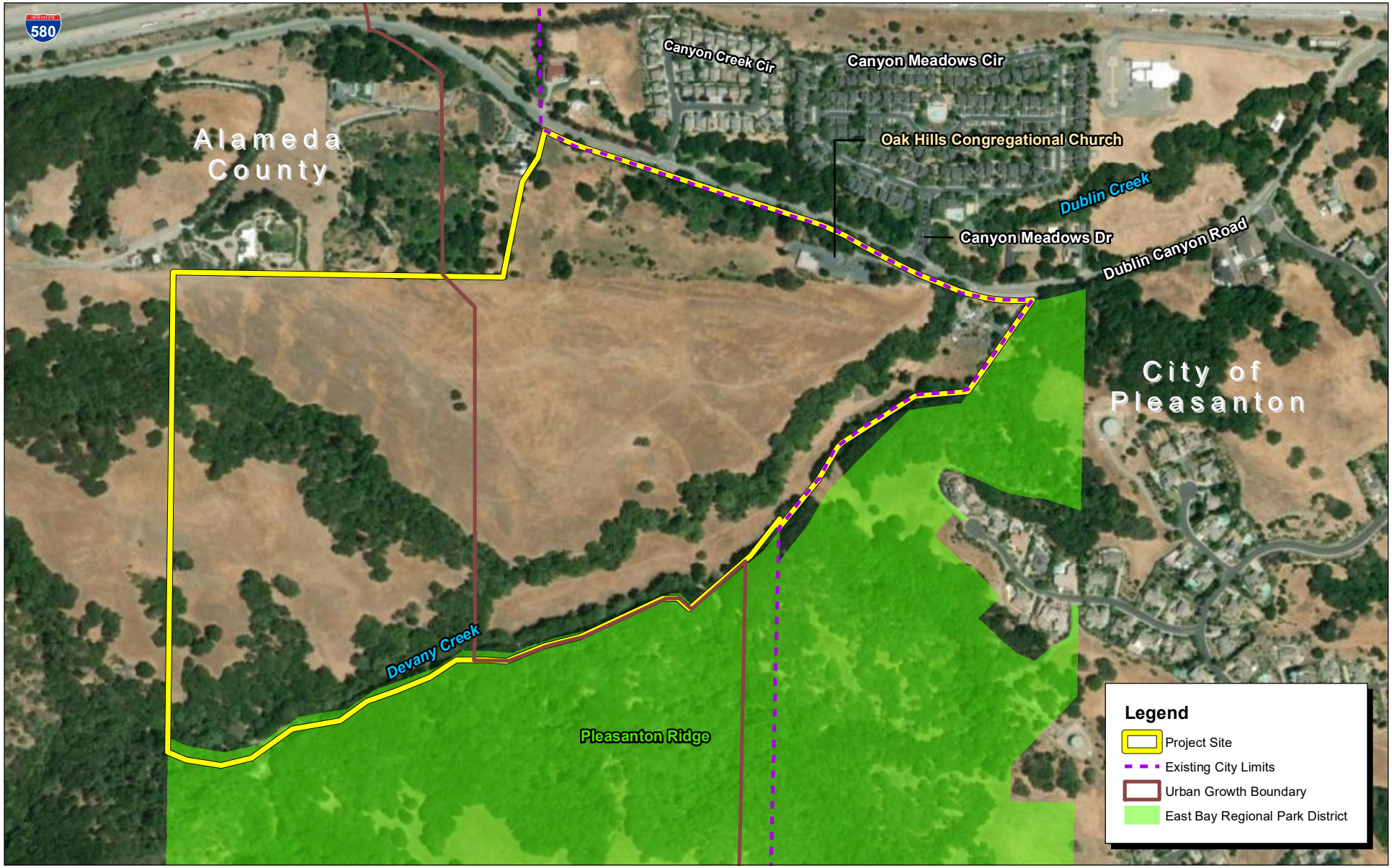


Source: Census 2000 Data, The California Spatial Information Library (CaSIL).

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Exhibit 2-1
Regional Location Map

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Source: ESRI Aerial Imagery. RUGGERI~JENSEN~AZAR, March 2025. City of Pleasanton.

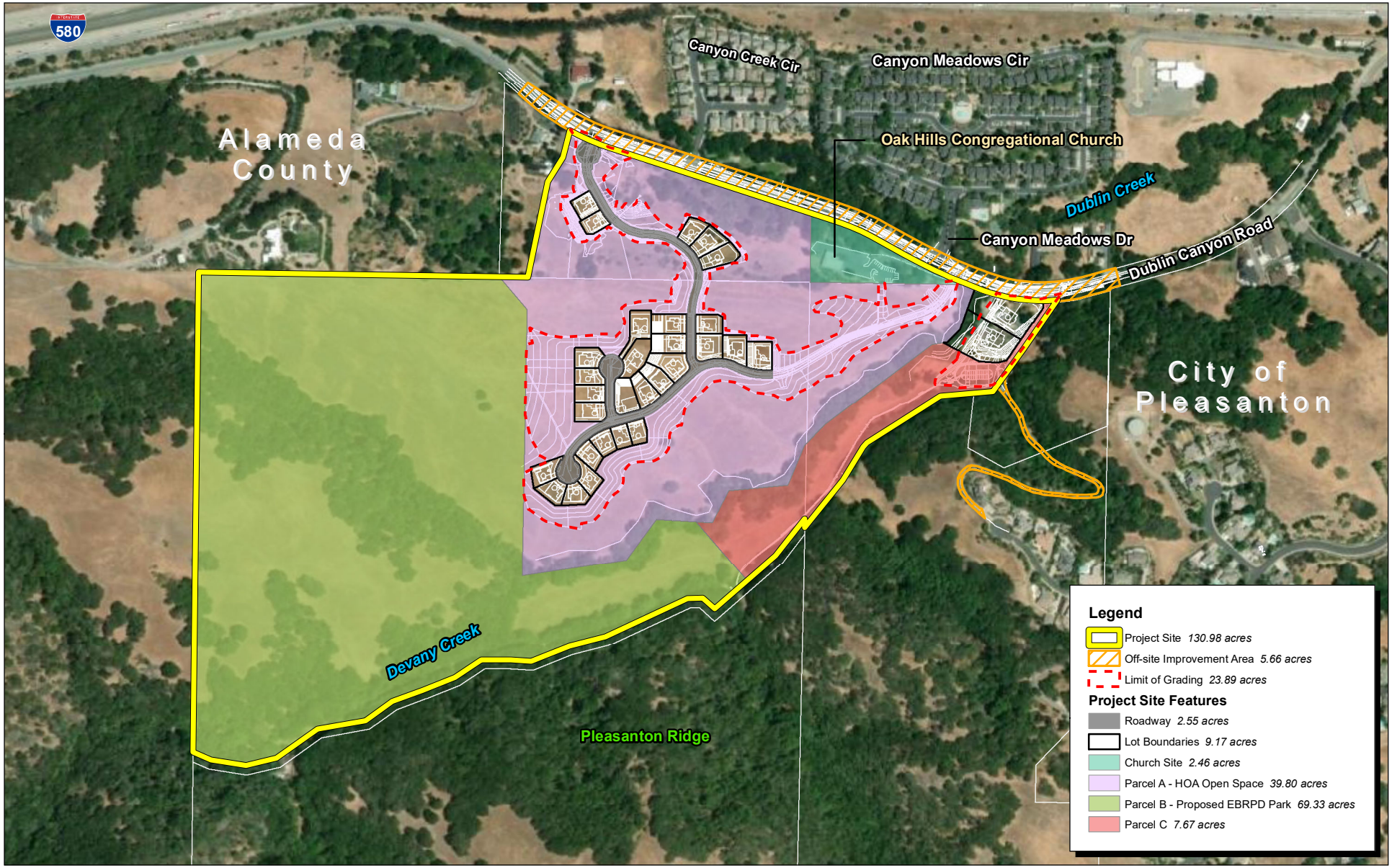
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Exhibit 2-2a
Local Vicinity Map

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Source: ESRI Aerial Imagery. RUGGERI~JENSEN~AZAR, March 2025. City of Pleasanton.

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Exhibit 2-2b
Local Vicinity Map

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As shown in Exhibit 2-3, the project site consists of seven Assessor's Parcel Numbers (APNs) 941-2500-002, 941-2500-003, 941-2600-002-6, 941-2600-002-8, a portion of APN 941-2600-2-9, and 941-2700-2, as well as the church site, APN 941-2700-1. The portion of the project site located to the east of the City's UGB would be annexed into the City. This area includes annexation of the church site to ensure a logical reorganization of City boundaries, aligned with guidance received from the LAFCo.

As shown in Exbibit 2-2, the project site is roughly bounded by Dublin Canyon Road to the north; Devany Canyon and Creek and the East Bay Regional Park District (EBRPD) land to the west and south; and agricultural lands to the west. Hills and knolls dominate the topography of the site, sloping down to Devany Creek bordering the southeast site boundary. Regional access to the project site is provided via I-580 at the San Ramon Road/Foothill Road Interchange, which is located approximately 0.73-mile east of the project site. Local vehicular access to the project site is provided via Dublin Canyon Road, which generally runs parallel to I-580.

2.1.3 - Existing Project Site Characteristics

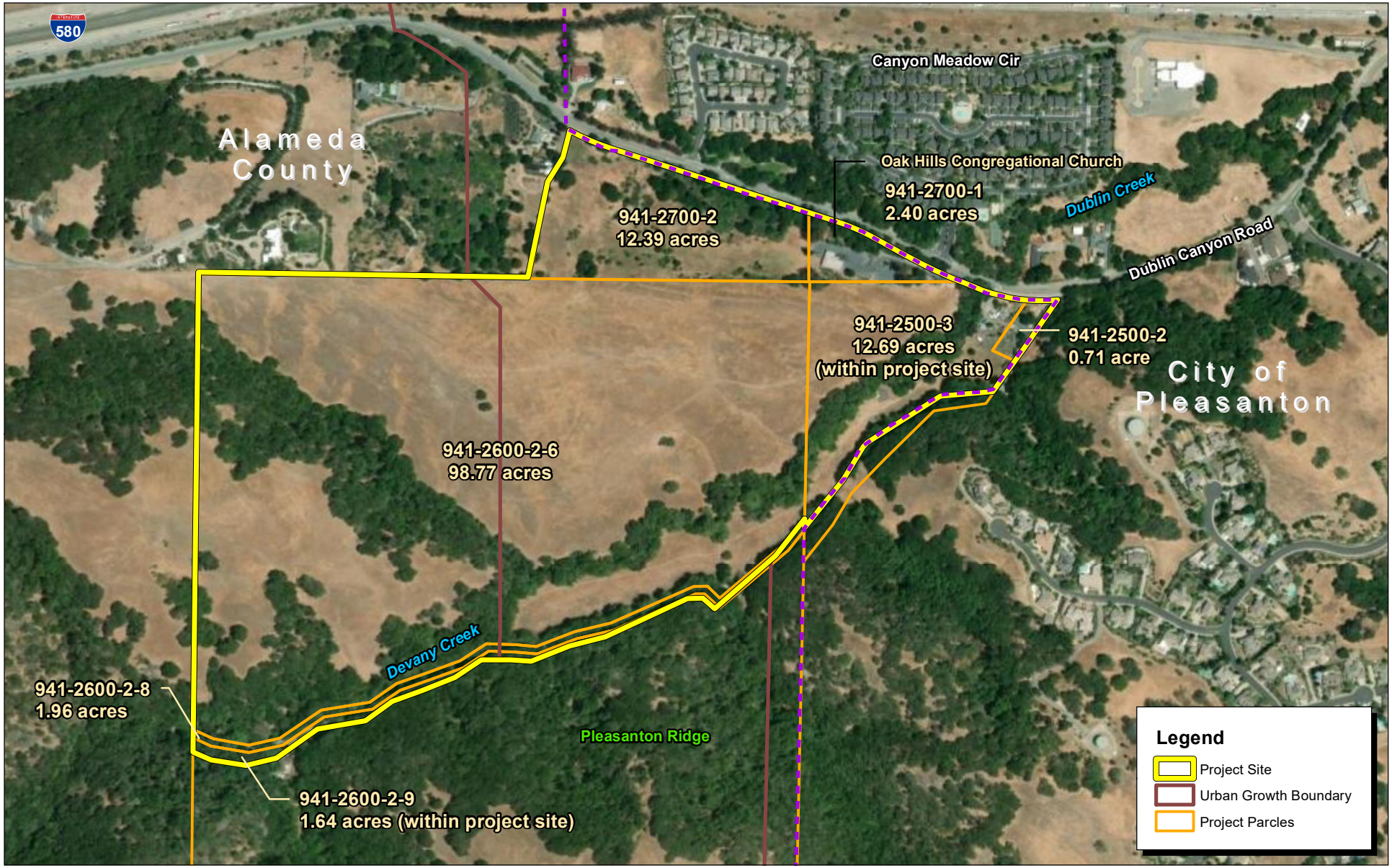
The project site is an irregularly shaped parcel, consisting of a series of hills and knolls with a maximum elevation around 774 feet above mean sea level (AMSL) at the ridgeline in the southwestern portion of the project site and a minimum elevation of 438 feet AMSL along Devany Creek. As shown in Exhibit 2-2, the project site abuts Dublin Canyon Road in the vicinity of Canyon Creek Circle and Canyon Meadows Drive.

Approximately 110 acres of the project site are owned by the Lester Family, 18.5 acres in the northern portion are owned by Ponderosa Homes, and the 2.5-acre church site is owned by the Oak Hills Congregation. The development site is mostly undeveloped, except for two residential homes and related structures, both owned by the Lester family, located on APNs 941-2500-2 and 941-2500-3. The church site is currently developed with the Oak Hills Congregational Church and parking lots. APN 941-2600-08 is a 40-foot easement to EBRPD for use of a roadway for vehicles, pedestrians and animals, and as a right-of-way for water, gas, oil, sewer pipe lines and telephone, electric light, and power lines.

The most prevalent habitat on the project site is California annual grassland, and the site also contains extensive riparian woodland habitat associated with Devany Creek and its unnamed tributary. Some seasonal wetlands occur in the northern portion of the site near Dublin Canyon Road. The project site has been used as rangeland for cattle grazing since the early 1900s.

The riparian woodland habitat is dominated by coast live oak trees. Other tree species include California bay, big-leaf maple, valley oak, and elderberry, in addition to ornamental and fruit trees in residential areas. A total of 171 individual trees over 6 inches in diameter were observed on the development site and open space, consisting of 22 different species.

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Source: ESRI Aerial Imagery. RUGGERI~JENSEN~AZAR, March 2025. City of Pleasanton. County of Alameda.

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Exhibit 2-3
Existing Parcel Map

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2.1.4 - Existing Land Use Designation and Zoning

Land Use Designation

The Pleasanton General Plan establishes goals and policies related to development, including goals intended to preserve open spaces, scenic views, community character, and natural features such as hillsides and ridges.

The project site is within the Pleasanton's General Plan Planning Area (Exhibit 2-1). As shown in Exhibit 2-4, the western portion of the project site, primarily located outside of the UGB, is designated Open Space–Agriculture and Grazing (OS-AG); the eastern portion of the project site, located within the UGB, is designated either Low Density Residential (R-LD) or Open Space–Public Health and Safety (OS-PHS).

The development site and open space is also within the Housing Element Sites Overlay (HESO), established by the updated Housing Element, adopted in 2023. The site is identified as "Area 1–Lester."

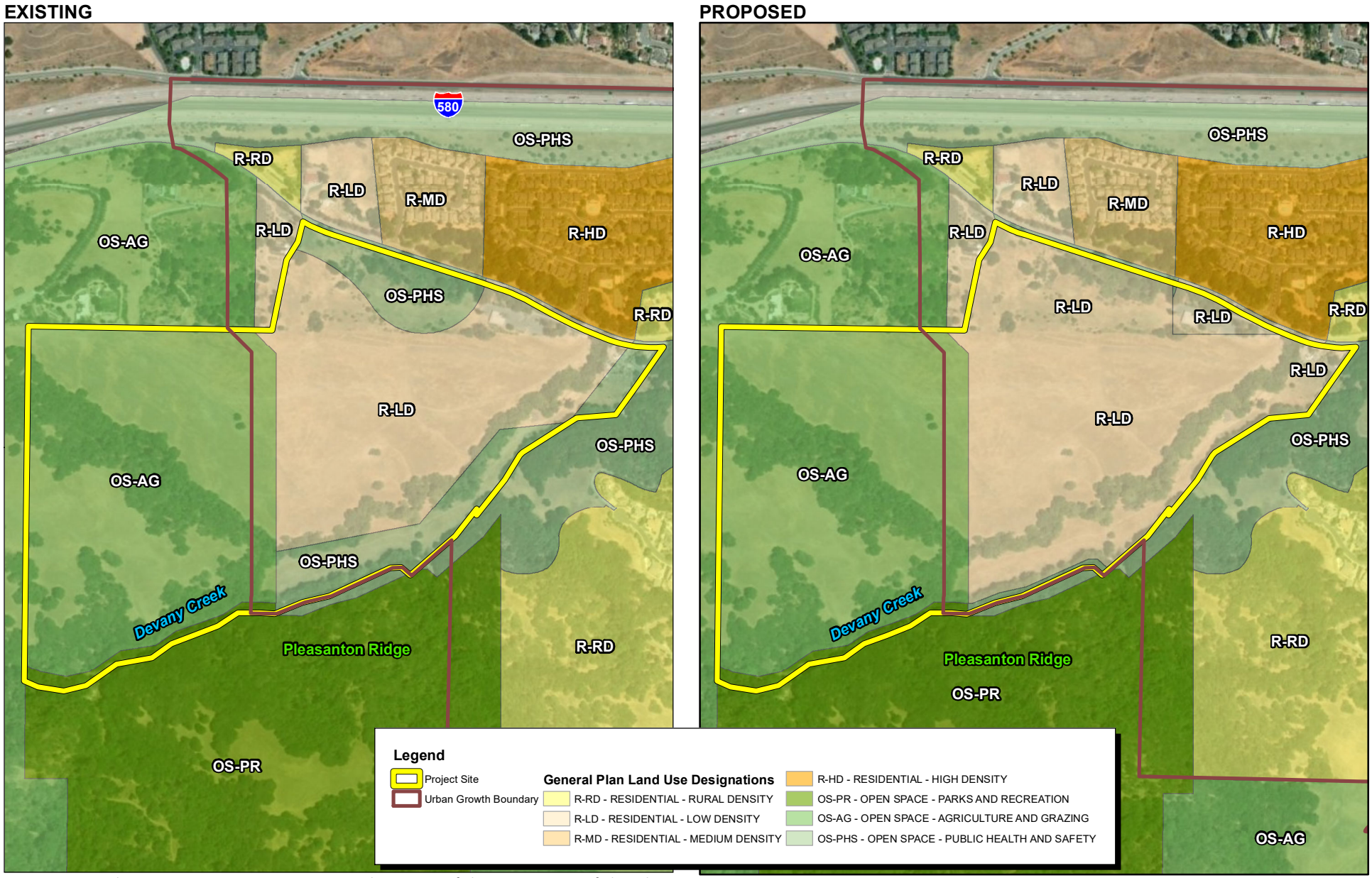
Zoning

The Pleasanton Municipal Code contains the City's planning and zoning ordinances and sets forth requirements related to design review, including types of projects that are subject to review, the scope of review, and the procedures by which review occurs. Title 18 of the Municipal Code contains the City's Zoning Ordinance, which specifies land development requirements (setbacks, heights, density) that apply to properties in the City. All territory that is annexed to the City is either prezoned or automatically classified in the S study district.

Exhibit 2-5 shows the existing zoning for the project site, which is Planned Unit Development-Low Density Residential/Agricultural/Open Space-Housing Opportunity Zone (PUD-LDR/A/OS-HOZ) and unincorporated. These designations are discussed below.

- **PUD-LDR:** The Zoning Ordinance states that a Planned Unit Development (PUD) district is intended to encourage imagination and housing variety in the development of property of varying sizes and topography, avoiding the monotony of standard residential, commercial, and industrial developments. The PUD procedure ensures that the desires of the developer and the community are understood and approved prior to commencement of construction.
- **OS-PHS:** The General Plan states that an Open Space–Public Health and Safety (OS-PHS) district is land set aside for the protection of the public health and safety due to geologic, topographic, fire, or other hazards. No development is allowed in these areas other one single-family home on each existing lot.
- **A:** The Zoning Ordinance indicates that an Agricultural (A) district is permitted one-family dwelling unit and one ADU or junior ADU per each site.
- **HOZ:** This zoning district is utilized for sites identified and contemplated within the Housing Element Update as Housing Element Opportunity sites.

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Source: ESRI Aerial Imagery. RUGGERI~JENSEN~AZAR, March 2025. City of Pleasanton. County of Alameda.

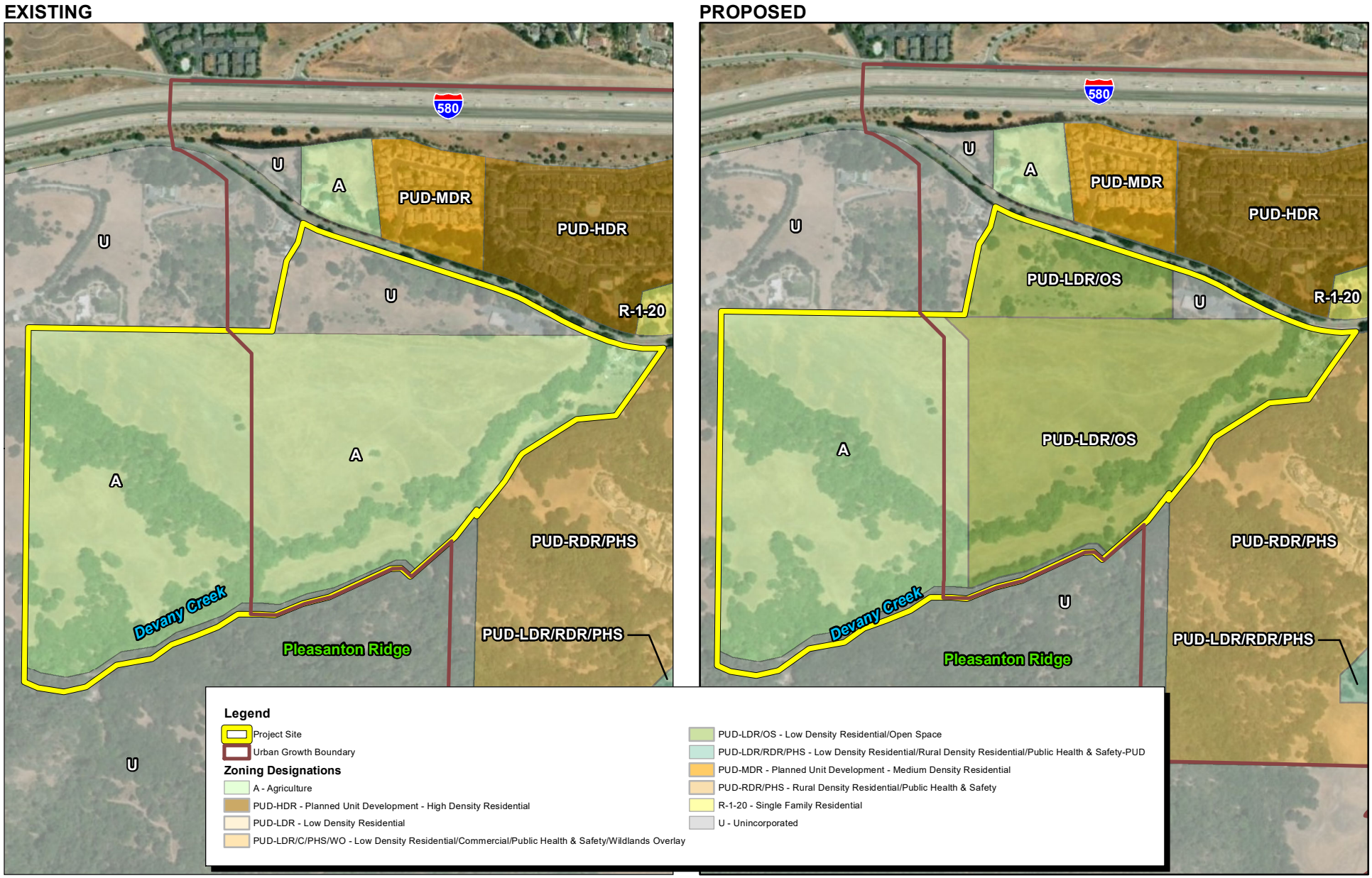
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Exhibit 2-4
Existing and Proposed General Plan Land Use

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Source: ESRI Aerial Imagery. RUGGERI~JENSEN~AZAR, March 2025. City of Pleasanton. County of Alameda.

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Exhibit 2-5
Existing and Proposed Zoning

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Measure FF

In November 1996, the voters of the City of Pleasanton approved Measure FF, requiring voter approval for all but minor refinements to the City's UGB. Areas outside the UGB line are generally suitable for the long-term protection of natural resources, large lot agriculture and grazing, parks and recreation, and similar uses. Pleasanton General Plan Land Use Element Policy 22 does not allow urban development beyond the UGB line. Measure FF is consistent with the Land Use Element of the Pleasanton General Plan, Goal 3, Policy 22, which states, "Maintain a permanent Urban Growth Boundary (UGB) beyond which urban development shall not be permitted."

The proposed project would result in the development of areas that are currently within the UGB; no development would occur outside of the UGB, and no modification to the UGB line is required or proposed. Areas included in the project site that fall outside of the UGB would be proposed as open space lands to be dedicated to EBRPD, which would provide long-term protection of these areas as open space and park lands (Exhibit 2-2).

Measures PP and QQ

In November 2008, City of Pleasanton voters approved two ballot initiatives relating to the City's growth limits and regarding General Plan policy:[3]

1. Measure PP: Save Pleasanton's Hills and Housing Cap, a voter initiative
2. Measure QQ: The Pleasanton Ridgelines Protection and Growth Control Initiative (a City Council measure)

These two measures were incorporated into the Pleasanton General Plan adopted by the City Council on July 21, 2009.

Measure PP adopted specific General Plan policies to limit placement of housing units and structures on slopes of 25 percent or greater or within 100 vertical feet of a ridgeline; limit grading on slopes of 25 percent or more or within 100 feet of a ridgeline to build residential or commercial structures; and exempt from these restrictions projects of 10 or fewer housing units on property that constituted a single legal parcel, as of January 1, 2007. Measure PP also limits the subdivision of a legal parcel, existing as of January 1, 2007, to approve more than 10 housing units.

Pleasanton General Plan, Policy 21.3, which outlines the goals and directives of Measure PP, states the following: "Ridgelines and hillsides shall be protected. Housing units and structures shall not be placed on slopes of 25 percent or greater, or within 100 vertical feet of a ridgeline. No grading to construct residential or commercial structures shall occur on hillside slopes 25 percent or greater, or within 100 vertical feet of a ridgeline. Exempt from this policy are housing developments of 10 or fewer housing units on a single property. Splitting dividing or subdividing a 'legal parcel' to approve more than 10 housing units is not allowed."

[3] As subsequent litigation determined that Pleasanton's earlier voter adopted housing cap was in conflict with State law, those portions of Measure PP related to the housing cap are not discussed here.

Measure QQ reaffirmed and readopted policies in the Pleasanton General Plan to (1) preserve scenic hillside and ridge views of specific ridges; (2) study the feasibility of preserving large open space areas in the Southeast Hills; and (3) protect large contiguous areas designated as Open Space in the Pleasanton General Plan.

2.1.5 - Surrounding Land Uses

Surrounding land uses include residential development of varying density to the north; public health and safety open space to the east and south, with low density residential development farther east; and EBRPD lands to the west, which are currently used for grazing. The existing city limits follow the project site's northern and eastern boundary, while the City's UGB bisects the project site from north to south, as shown in Exhibit 2-2.

West

The project site is bounded by undeveloped land to the west, owned by EBRPD. The undeveloped land consists mostly of grasslands, trees, and hilly terrain.

North

The project site is roughly bounded by Dublin Canyon Road to the north. Beyond Dublin Canyon Road are the Canyon Meadows and Canyon Creek residential developments, I-580, and undeveloped land and residential development north of I-580.

East

The project site is partially bounded by Devany Canyon and Creek and EBRPD lands to the east. Large lot rural residential units are also located to the east of the project site.

South

The project site is partially bounded by Devany Creek and EBRPD lands on the south. Beyond Devany Canyon and Creek and the EBRPD lands is other undeveloped land that consists mostly of grasslands, trees, and hilly terrain.

2.2 - Project Objectives

Ponderosa Homes III, Inc., proposes to develop 28 homes to serve the growing needs of Pleasanton's expanding workforce and to provide an open space preserve with public access to the Pleasanton Ridge trail system for hikers, bikers, and equestrians. Working with EBRPD, this access would complete the Pleasanton Ridge trail system and would provide public access to trails and open space properties owned by EBRPD that has been envisioned and proposed over the last 30 years.

The objectives of the proposed project are to:

- Provide a well-designed residential neighborhood with a strong sense of community and connection with adjacent open space;

- Encourage redevelopment of underused sites containing available infrastructure as identified in the Pleasanton General Plan Housing Element;
- Develop a residential community consistent with Measures PP and QQ;
- Provide open space areas across the project site and dedicate land to the EBRPD to be permanently preserved;
- Provide public access, including a public parking/staging area and a trail connection, to Pleasanton Ridge;
- Preserve the open space character at the edges of the City, in accordance with the City of Pleasanton General Plan Community Character Element; and
- Improve Dublin Canyon Road to increase access and safety by constructing roadways, sidewalks, and bike lanes.

2.3 - Project Components

The following is a summary of the proposed project components:

1. Twenty-eight new homes on large lots adjacent to permanent open spaces and accessed by a private security gate. The proposed project has undergone significant analysis and review regarding compliance with Measures PP and QQ, including staking site conditions, site visits with City Staff and elected officials, and engineering analysis; the proposed project would meet the requirements of Measures PP and QQ.
2. Two replacement homes on large lots for the Lester family who currently reside on the property; these two homes would replace existing homes at the same locations.
3. ADU options, ranging in size from 394 square feet to 720 square feet, included in three of the proposed housing plans.
4. Dedication of approximately 69.3 acres of permanent open space to EBRPD; an additional approximate 39.9 acres of permanent open space would be owned and maintained by the new community's Homeowner's Association (HOA). An additional 7.6 acres would eventually be transferred as part of the Life Estate directive of the Lester Family Trust.
5. A new public trailhead to be dedicated to EBRPD with a restroom, parking, an equestrian staging area, and a new trail providing access to the Pleasanton Ridge EBRPD trail system.
6. A new traffic signal at Canyon Meadows Drive to resolve existing safety issues and improve access for the Canyon Meadows neighborhood and the Oak Hills Congregation Church.
7. Annexation of approximately 72.6 acres of the project site (located within the UGB) into the City.
8. Widening and improvements to Dublin Canyon Road, increasing safety for pedestrians, vehicles, and bicyclists.

2.3.1 - Proposed Land Use Designation and Zoning

Land Use Designation

The Pleasanton General Plan establishes goals and policies related to development, which include goals intended to preserve open spaces, scenic views, community character, and natural features such as hillsides and ridges. The proposed project includes annexation of approximately 72.6 acres into the City of Pleasanton, along with a General Plan Amendment of Public Health/Safety (PH) Overlay to Residential-Low Density (R-LD).

As some of the lots on the lower portion of the project site would be located within an area designated as Open Space-Public Health and Safety (OS-PH), the Pleasanton General Plan would be amended to accommodate and allow for the proposed development and to reflect Low Density Residential (LDR), Open Space (OS), Public Health and Safety (PH), Agriculture and Grazing (OS-AG), and/or Open Space–Parks and Recreation (OS-PR), where appropriate (Exhibit 2-4).

Zoning

To facilitate development of the proposed residential community, the development site and open space would be zoned to conform with the current pre-zoning described above as shown in Exhibit 2-6. The church site would be zoned as R-LD. Pursuant to the City's Growth Management Ordinance (Pleasanton Municipal Code Chapter 17.36), the proposed project would require a Growth Management Allocation for the 28 net proposed units. Approval of the allocation is at the City Council's discretion, so long as the total annual Citywide limit on new residential units for the year of application is not exceeded.

Table 2-1 provides an overview of parcels within the project site and summarizes existing and proposed General Plan land use and Zoning.

Table 2-1: General Plan Land Use and Zoning Summary

Assessor's Parcel Number (APN)	Size (ac)[1]	Annexation Proposed?	Existing General Plan Land Use	Proposed General Plan Land Use	Existing Zoning[2]	Proposed Zoning
941-2500-2	0.7	Yes	OS-PHS	R-LD	A	PUD-LDR/OS
941-2500-3	12.7	Yes	OS-PHS; R-LD	R-LD	A	PUD-LDR/OS
941-2600-2-6	98.8	Yes	OS-AG; OS-PHS; R-LD	OS-AG; R-LD	A	A; PUD-LDR/OS
941-2600-2-8	1.96	Yes	OS-PR	OS-PR	U	PUD-LDR/OS
941-2600-2-6	1.64	Yes	OS-PR	OS-PR	U	PUD-LDR/OS
941-2700-2	12.4	Yes	OS-PHS; R-LD	R-LD	U	PUD-LDR/OS
941-2700-1	2.4	Yes	R-LD	R-LD	U	PUD-LDR/OS

Source: City of Pleasanton. County of Alameda.
Notes:
APN = Assessor's Parcel Number
ac = acre

Assessor's Parcel Number (APN)	Size (ac)[1]	Annexation Proposed?	Existing General Plan Land Use	Proposed General Plan Land Use	Existing Zoning[2]	Proposed Zoning

[1] Size noted herein includes only the area of each APN located within the project site boundary.
[2] The project site has a pre-zoning of PUD-LDR/A/OS-HOZ

Housing Element Update

The development site and open space were evaluated as Site 1 (Lester) in the City of Pleasanton 2023-2031 (6th Cycle) Housing Element Update (Housing Element Update) and associated Housing Element Update Program EIR. The Housing Element Update was adopted on January 20, 2023, and further revised in August 2023. The Housing Element Update proposed to zone the project site as PUD-LDR/A/OS with a density range of 2 dwelling units per acre.

2.3.2 - Land Uses

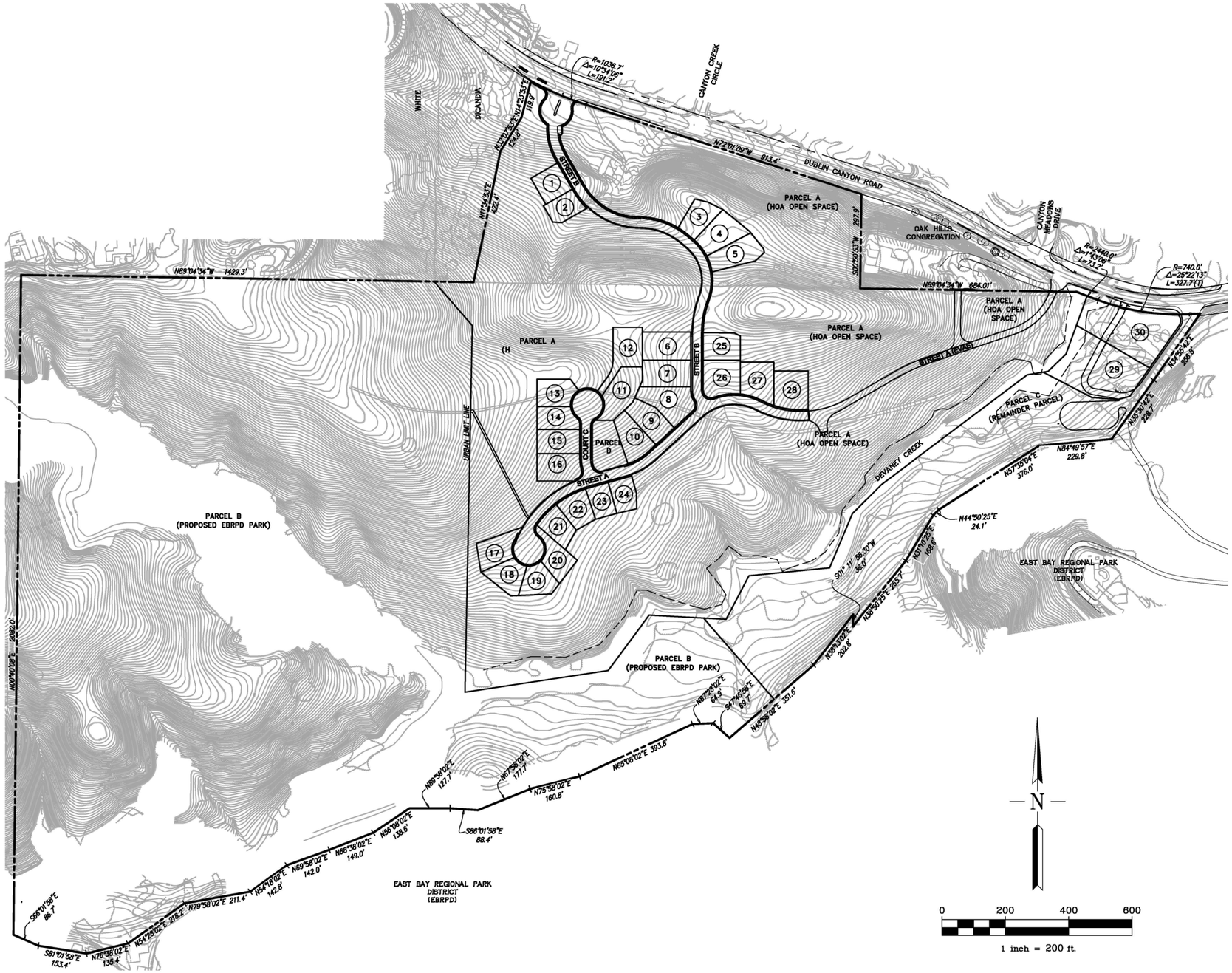
The project site plan is shown on Exhibit 2-6 and project components are summarized in Table 2-2.

Table 2-2: Project Component Summary

Land Use Type	# Units	Acres	% of Site[1]
Low Density Residential (LDR)–SF Detached	28	6.9	5.3%
Accessory Dwelling Units (ADUs)	3	—	—
New Lester Residential–SF Detached	2	1.9	1.5%
Right-of-way (Streets and Sidewalks)	—	2.6	2.0%
HOA Open Space (Parcel A)	—	39.9	30.5%
Proposed EBRPD Park (Parcel B)	—	69.3	52.9%
Remainder Parcel C (Private)	—	7.6	4.6%
HOA Open Space–Stormwater Treatment Basin (Parcel D)	—	0.3	0.2%
Proposed church site annexation	—	2.4	1.8%
TOTAL	**30**	**130.9**	**100%**

Notes:
All values are approximate.
EBRPD = East Bay Regional Park District
HOA–Homeowner's Association
[1] Percentages are rounded to the nearest 10th.
Source: Ruggeri-Jensen-Azar. 2024.

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Source: Ruggeri-Jensen-Azar, July 31, 2024.

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Exhibit 2-6
Site Plan

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Residential Uses

As shown on Exhibit 2-6, project implementation would result in the development of a gated subdivision with 28 new two-story, detached single-family homes, 3 ADUs, private open space, and related project site improvements. The project would retain two existing lots (Lots 29 and 30) where two existing homes owned by the Lester family are located. The two existing homes would be demolished and two new single-family homes would be constructed in the same location. Residential lots would have a maximum lot size of approximately 14,884 square feet.

The Lesters would also retain a parcel referenced as Parcel C shown on Exhibit 2-2 for continued agricultural use, including the construction of a storage building and related ranch-type structures, but with no allowance for residential use.

Open Space Uses

A total of 117.1 acres would be designated open space on four parcels. Parcel A would contain 39.9 acres of open space to be owned and managed by the HOA; Parcel B would be dedicated to EBRPD, preserving 69.3 acres as open space. Parcel C would add another 7.6 acres of open space to be retained by the current owner for future dedication to EBRPD. Parcel D would be HOA Open Space of 0.3 acre.

The proposed project includes the construction of an EBRPD parking lot and trailhead access off Dublin Canyon Road adjacent to the Lester residences. Construction would include a gated, public staging area providing access to EBRPD with 16 parking stalls, four trailer parking stalls, and trail connections to Pleasanton Ridge. Construction would also include a public access road along a portion of the existing non-exclusive access easement located along the eastern boundary of the Lester property. This public staging area would serve as a trailhead for access to the northern terminus of the Pleasanton Ridge trail system and would fulfill an important part of the Pleasanton Ridge master land use plan adopted by EBRPD.

While the Lester family would retain ownership of the Remainder Parcel C, they have agreed to a “life estate” dedication of this parcel to EBRPD. Upon the passing of the last Lester family members, this parcel would revert to EBRPD ownership, thus completing the development of the staging area and securing the entire 76.9 acres of open space, parking/staging, and trail for public use.

Roadway Uses

The proposed project would include the construction of several improvements to Dublin Canyon Road, including a traffic signal at the intersection of Canyon Meadows Drive, construction and striping of 6-foot-wide bike lanes on both sides of Dublin Canyon Road along the project frontage, and the creation of a 5-foot-wide sidewalk or pathway on Dublin Canyon Road to the EBRPD trailhead and staging area. Visual simulations of these proposed improvements are provided in Exhibit 2-7a and Exhibit 2-7b. The new signal would provide revised access with improved safety for the Oak Hills Congregation. All of these improvements would improve public safety and access along this two-lane county road that experiences heavy traffic during commute hours.

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Exhibit 2-7a
Visual Simulation
Dublin Canyon Road and Canyon Meadows Drive

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Exhibit 2-7b
Visual Simulation
Dublin Canyon Road Project Entrance

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The new streets, gated entryway, and landscaped streetscape, as well as some open space areas, will be privately maintained within the community via the establishment of an HOA. An Emergency Vehicle Access (EVA) roadway would be constructed to connect Dublin Canyon Road with the Oak Hill Congregational Church driveway connection. The EVA and project access road system would also include sewer, water, and storm drainage connections for the proposed project, as well as a water pump station. An access road at the end of Street A is provided to allow continued access by the rancher(s) grazing livestock on the open space areas outside of the UGB.

2.3.3 - Circulation and Access

Vehicle Circulation and Access

A landscaped gated entry off Dublin Canyon Road in the northwestern corner of the site would provide access for the new homes. Three new internal roadways, Street A, Street B, and Court C are proposed, which would provide connection to the project site from Dublin Canyon Road. Street A would provide a 20- to 21-foot-wide EVA via Dublin Canyon Road extending southwest within the project site to its terminus past Court C. Street B is the main entrance to the project site and is proposed to be gated access. Street B would connect to Dublin Canyon Road west of Street A, extending south within the project site and connecting to Street A.

Access to the Lester property would remain from an existing entrance on Dublin Canyon Road, which would become a paved loop connecting to the EBRPD easement to the east of the existing Lester property. The EBRPD easement would be a new paved access to the planned trailhead and parking area to the south of the Lester property, as shown on the site plan (Exhibit 2-5). Bollards would be installed at the Lester driveway connection to Dublin Canyon Road, and a private access gate would be constructed at the loop's connection with the EBRPD easement. An EVA would cross a small portion of the Oak Hills Congregational Church's driveway for the installation of underground utilities and improved access to the adjacent church site.

While the proposed project does not include trail construction on the adjacent open space, a driveway easement and open space access would be constructed at the end of Street A, and sidewalks would be required along the frontage of lot 30 on Dublin Canyon Road as well as along the rear of the Lester property in the new EBRPD access.

Transit

The proposed project does not include any transit improvements. The City provides a variety of transit options. The Pleasanton Paratransit Service provides local door-to-door and fixed routed bus services for seniors, ages 70 and older, and American with Disabilities Act (ADA) qualified individuals, ages 18 and older. Livermore Amador Valley Transit Authority, Bay Area Rapid Transit (BART), Altamont Commuter Express (ACE) Rail, and Amtrak provide other transit options for residents of the Tri-Valley area.

Bicycle

According to Figure 3-3c: Map 3, Unincorporated Areas Bicycle Plan 2012, of the Alameda County Bicycle and Pedestrian Master Plan for Unincorporated Areas, Class II bike lanes in both directions

currently exist along Dublin Canyon Road along the project frontage. Dublin Canyon Road is also a part of the Alameda County Transportation Commission (Alameda CTC) 2006 Countywide Bicycle Network.

As discussed above, the proposed project would include the striping of 6-foot-wide bike lanes on both sides of Dublin Canyon Road along the project frontage.

Pedestrian

The proposed project proposes the construction of sidewalks along Street A, Street B and Court C. The proposed project also includes the construction of a 5-foot-wide sidewalk along the front of lot 30 along Dublin Canyon Road and a pedestrian crossing at Canyon Meadows that would facilitate access to the proposed EBRPD trailhead. Crosswalks are also proposed to be constructed within the development site.

2.3.4 - Design, Landscaping, and Lighting

Building Design and Height

Three different floor plans would range in size from 3,750 to 4,250 square feet, with four architectural styles: Rustic Villa (Mediterranean), Spanish, Prairie, and Farmhouse. These plans would all possess classic elements, details, color schemes, and stonework to fit in or be congruent with the rolling landscape of the development site and open space. A selection of various exterior color schemes (three per elevation style) would provide continuity with the design themes and added variation within the new neighborhood. Exhibit 2-8a through Exhibit 2-8c illustrate representative architectural styles.

Landscaping

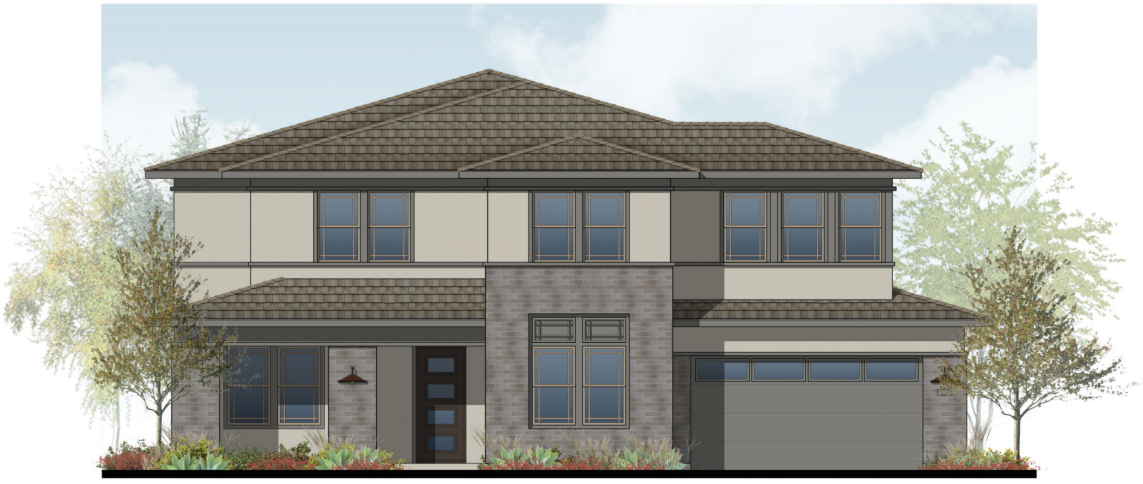
Landscape elements would be native and native-type species that are drought-tolerant and wind resistant to conserve water use. No artificial landscape plantings are proposed. High-efficiency drip irrigation would also reduce outdoor water use. Exhibit 2-9a through Exhibit 2-9e illustrate the areas of existing trees to remain as well as the conceptual landscape plan.

Lighting and Signage

The proposed project would include lighting elements for security and wayfinding, typical of a residential subdivision. Lighting elements would include roadway lighting, accent lighting at the entrance from Dublin Canyon Road to Street B, and accent lighting associated with landscaping and single-family residences. A community identification plaque would be provided at the development site's entrance from Dublin Canyon Road to Street B (see Exhibits 2-7a and 2-7b).



RUSTIC VILLA



PRAIRIE



SPANISH

Source: Bassenian Lagoni Architects, 03/15/2023.

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Exhibit 2-8a
Representative Architectural Styles

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RUSTIC VILLA



SPANISH



FARMHOUSE

Source: Bassenian Lagoni Architects, 03/15/2023.

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Exhibit 2-8b
Representative Architectural Styles

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RUSTIC VILLA



PRAIRIE



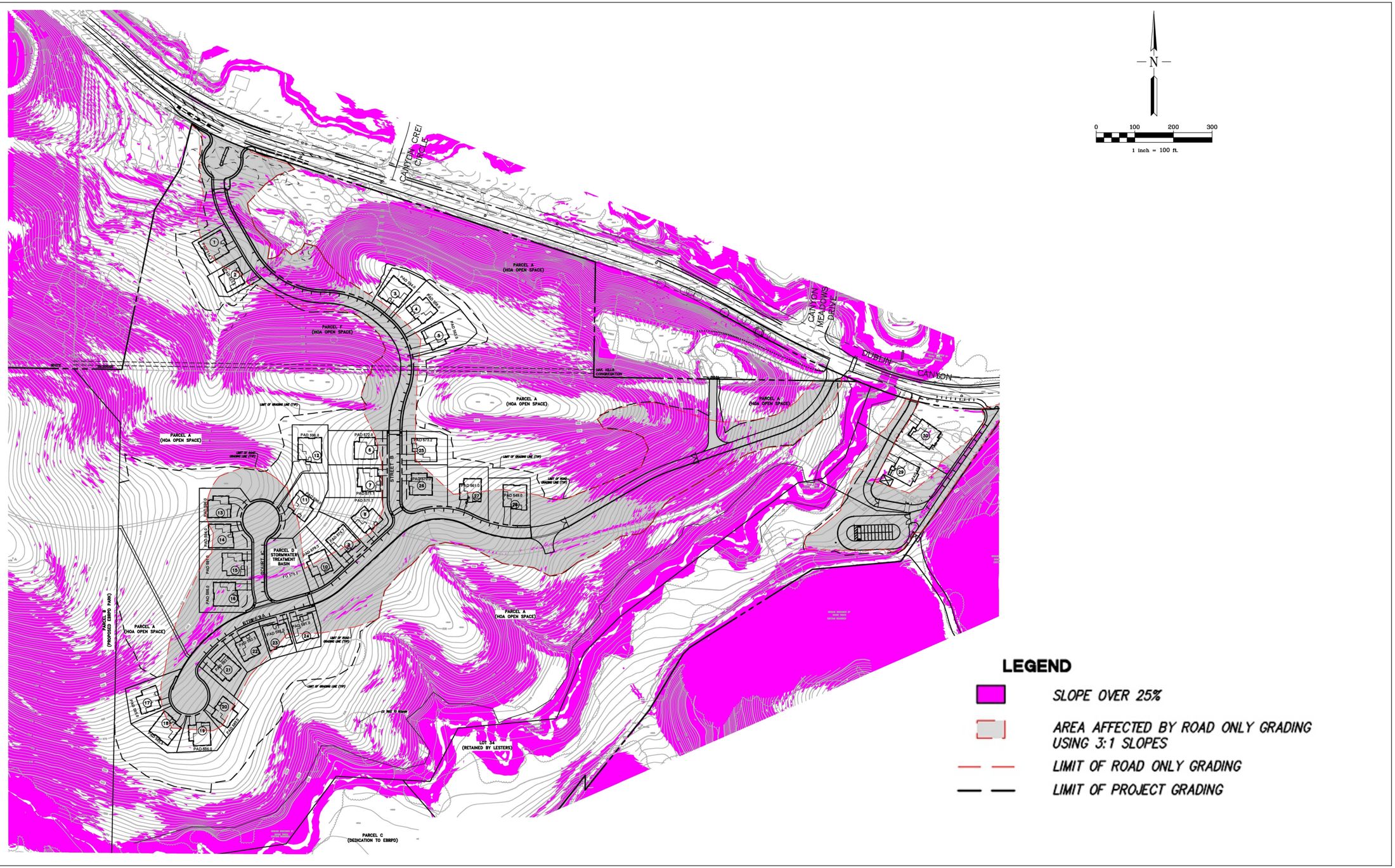
FARMHOUSE

Source: Bassenian Lagoni Architects, 03/15/2023.

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Exhibit 2-8c
Representative Architectural Styles

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Source: Ruggeri-Jensen-Azar, July 31, 2024.

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Exhibit 2-9
Slope Analysis and Grading Plan

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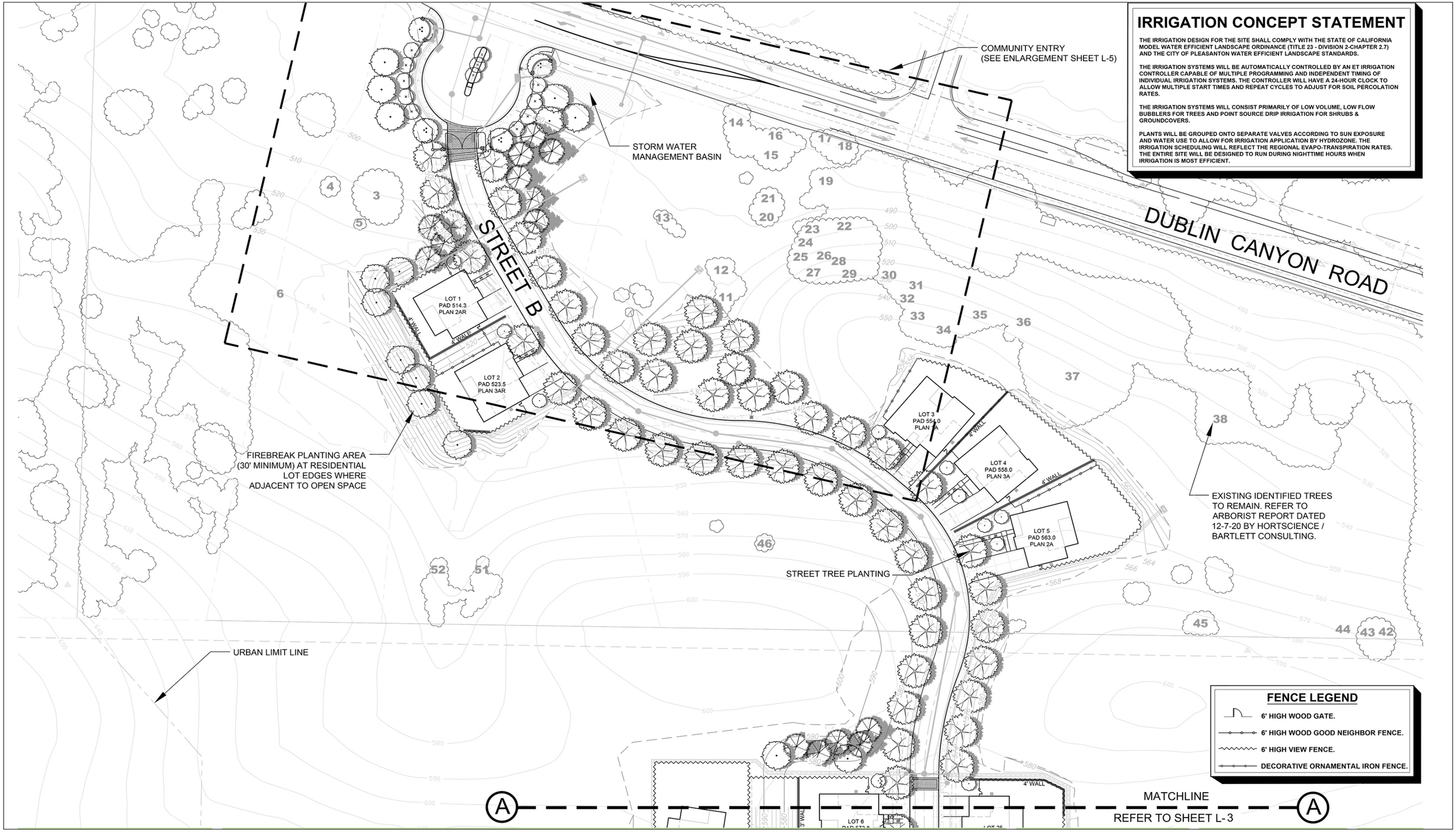


Source: vanderToolen Associates, March 20, 2023.

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Exhibit 2-9a
Conceptual Landscape Plan

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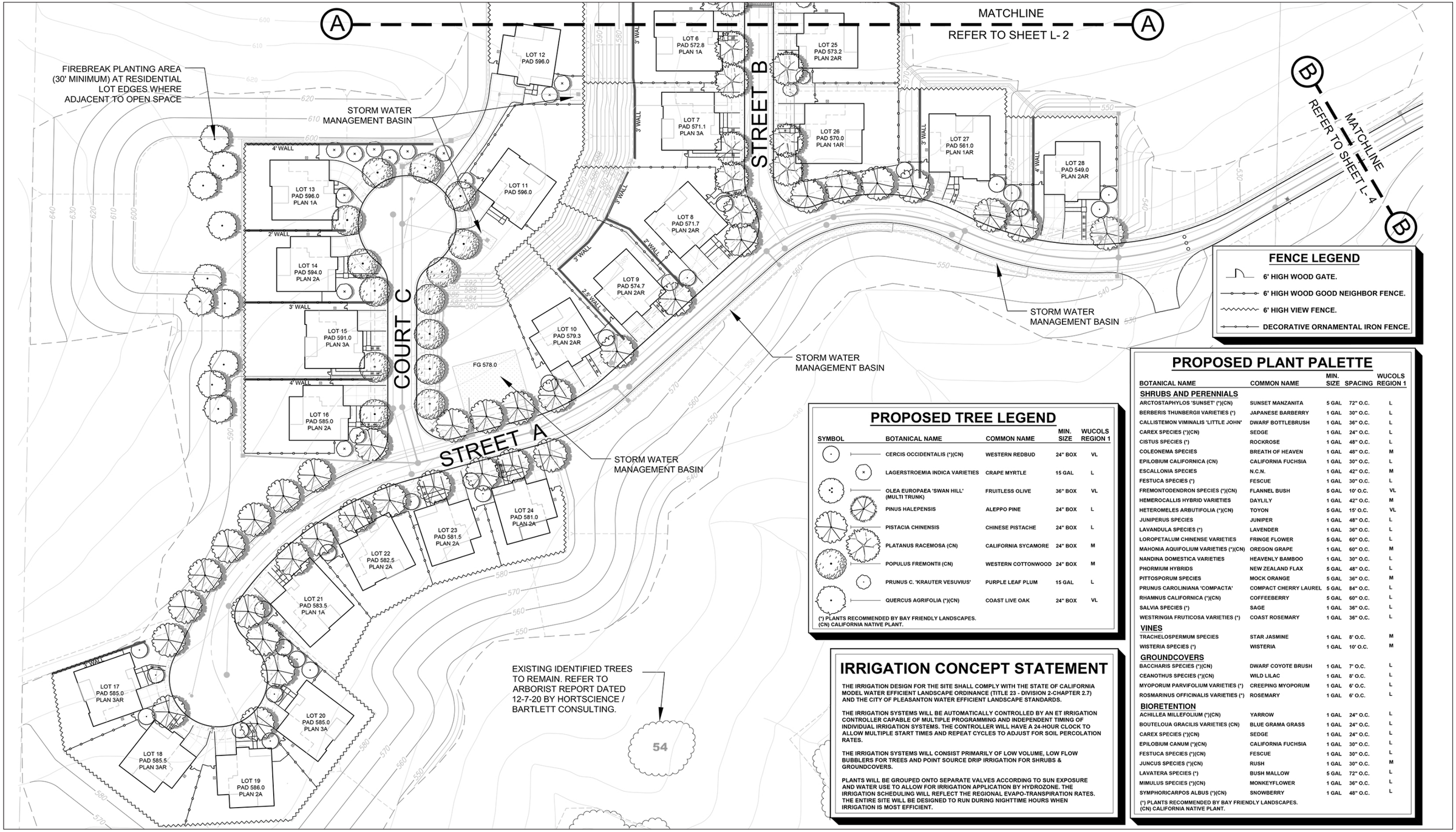


Source: vanderToolen Associates, March 20, 2023.

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Exhibit 2-9b
Conceptual Landscape Plan

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FENCE LEGEND

- 6' HIGH WOOD GATE.
- 6' HIGH WOOD GOOD NEIGHBOR FENCE.
- 6' HIGH VIEW FENCE.
- DECORATIVE ORNAMENTAL IRON FENCE.

PROPOSED TREE LEGEND

SYMBOL	BOTANICAL NAME	COMMON NAME	MIN. SIZE	WUCOLS REGION 1
	CERCIS OCCIDENTALIS (*)(CN)	WESTERN REDBUD	24" BOX	VL
	LAGERSTROEMIA INDICA VARIETIES	CRAPE MYRTLE	15 GAL	L
	OLEA EUROPAEA 'SWAN HILL' (MULTI TRUNK)	FRUITLESS OLIVE	36" BOX	VL
	PINUS HALEPENSIS	ALEPPO PINE	24" BOX	L
	PISTACIA CHINENSIS	CHINESE PISTACHE	24" BOX	L
	PLATANUS RACEMOSA (CN)	CALIFORNIA SYCAMORE	24" BOX	M
	POPULUS FREMONTII (CN)	WESTERN COTTONWOOD	24" BOX	M
	PRUNUS C. 'KRAUTER VESUVIUS'	PURPLE LEAF PLUM	15 GAL	L
	QUERCUS AGRIFOLIA (*)(CN)	COAST LIVE OAK	24" BOX	VL

(*) PLANTS RECOMMENDED BY BAY FRIENDLY LANDSCAPES.
(CN) CALIFORNIA NATIVE PLANT.

IRRIGATION CONCEPT STATEMENT

THE IRRIGATION DESIGN FOR THE SITE SHALL COMPLY WITH THE STATE OF CALIFORNIA MODEL WATER EFFICIENT LANDSCAPE ORDINANCE (TITLE 23 - DIVISION 2-CHAPTER 2.7) AND THE CITY OF PLEASANTON WATER EFFICIENT LANDSCAPE STANDARDS.

THE IRRIGATION SYSTEMS WILL BE AUTOMATICALLY CONTROLLED BY AN ET IRRIGATION CONTROLLER CAPABLE OF MULTIPLE PROGRAMMING AND INDEPENDENT TIMING OF INDIVIDUAL IRRIGATION SYSTEMS. THE CONTROLLER WILL HAVE A 24-HOUR CLOCK TO ALLOW MULTIPLE START TIMES AND REPEAT CYCLES TO ADJUST FOR SOIL PERCOLATION RATES.

THE IRRIGATION SYSTEMS WILL CONSIST PRIMARILY OF LOW VOLUME, LOW FLOW BUBBLERS FOR TREES AND POINT SOURCE DRIP IRRIGATION FOR SHRUBS & GROUNDCOVERS.

PLANTS WILL BE GROUPED ONTO SEPARATE VALVES ACCORDING TO SUN EXPOSURE AND WATER USE TO ALLOW FOR IRRIGATION APPLICATION BY HYDROZONE. THE IRRIGATION SCHEDULING WILL REFLECT THE REGIONAL EVAPO-TRANSPIRATION RATES. THE ENTIRE SITE WILL BE DESIGNED TO RUN DURING NIGHTTIME HOURS WHEN IRRIGATION IS MOST EFFICIENT.

PROPOSED PLANT PALETTE

BOTANICAL NAME	COMMON NAME	MIN. SIZE	SPACING	WUCOLS REGION 1
SHRUBS AND PERENNIALS				
ARCTOSTAPHYLOS 'SUNSET' (*)(CN)	SUNSET MANZANITA	5 GAL	72" O.C.	L
BERBERIS THUNBERGII VARIETIES (*)	JAPANESE BARBERRY	1 GAL	30" O.C.	L
CALLISTEMON VIMINALIS 'LITTLE JOHN'	DWARF BOTTLEBRUSH	1 GAL	36" O.C.	L
CAREX SPECIES (*)(CN)	SEDGE	1 GAL	24" O.C.	L
CISTUS SPECIES (*)	ROCKROSE	1 GAL	48" O.C.	L
COLEONEMA SPECIES	BREATH OF HEAVEN	1 GAL	48" O.C.	M
EPILOBIUM CALIFORNICA (CN)	CALIFORNIA FUCHSIA	1 GAL	30" O.C.	L
ESCALLONIA SPECIES	N.C.N.	1 GAL	42" O.C.	M
FESTUCA SPECIES (*)	FESCUE	1 GAL	30" O.C.	L
FREMONTODENDRON SPECIES (*)(CN)	FLANNEL BUSH	5 GAL	10' O.C.	VL
HEMEROCALLIS HYBRID VARIETIES	DAYLILY	1 GAL	42" O.C.	M
HETEROMELES ARBUTIFOLIA (*)(CN)	TOYON	5 GAL	15' O.C.	VL
JUNIPERUS SPECIES	JUNIPER	1 GAL	48" O.C.	L
LAVANDULA SPECIES (*)	LAVENDER	1 GAL	36" O.C.	L
LOROPETALUM CHINENSE VARIETIES	FRINGE FLOWER	5 GAL	60" O.C.	L
MAHONIA AQUIFOLIUM VARIETIES (*)(CN)	OREGON GRAPE	1 GAL	60" O.C.	M
NANDINA DOMESTICA VARIETIES	HEAVENLY BAMBOO	1 GAL	30" O.C.	L
PHORMIUM HYBRIDS	NEW ZEALAND FLAX	5 GAL	48" O.C.	L
PITTOSPORUM SPECIES	MOCK ORANGE	5 GAL	36" O.C.	M
PRUNUS CAROLINIANA 'COMPACTA'	COMPACT CHERRY LAUREL	5 GAL	84" O.C.	L
RHAMNUS CALIFORNICA (*)(CN)	COFFEEBERRY	5 GAL	60" O.C.	L
SALVIA SPECIES (*)	SAGE	1 GAL	36" O.C.	L
WESTRINGIA FRUTICOSA VARIETIES (*)	COAST ROSEMARY	1 GAL	36" O.C.	L
VINES				
TRACHELOSPERMUM SPECIES	STAR JASMINE	1 GAL	8' O.C.	M
WISTERIA SPECIES (*)	WISTERIA	1 GAL	10' O.C.	M
GROUNDCOVERS				
BACCHARIS SPECIES (*)(CN)	DWARF COYOTE BRUSH	1 GAL	7' O.C.	L
CEANOTHUS SPECIES (*)(CN)	WILD LILAC	1 GAL	8' O.C.	L
MYOPORUM PARVIFOLIUM VARIETIES (*)	CREEPING MYOPORUM	1 GAL	6' O.C.	L
ROSMARINUS OFFICINALIS VARIETIES (*)	ROSEMARY	1 GAL	6' O.C.	L
BIORETENTION				
ACHILLEA MILLEFOLIUM (*)(CN)	YARROW	1 GAL	24" O.C.	L
BOUTELOUA GRACILIS VARIETIES (CN)	BLUE GRAMA GRASS	1 GAL	24" O.C.	L
CAREX SPECIES (*)(CN)	SEDGE	1 GAL	24" O.C.	L
EPILOBIUM CANUM (*)(CN)	CALIFORNIA FUCHSIA	1 GAL	30" O.C.	L
FESTUCA SPECIES (*)(CN)	FESCUE	1 GAL	30" O.C.	L
JUNCUS SPECIES (*)(CN)	RUSH	1 GAL	30" O.C.	M
LAVATERA SPECIES (*)	BUSH MALLOW	5 GAL	72" O.C.	L
MIMULUS SPECIES (*)(CN)	MONKEYFLOWER	1 GAL	36" O.C.	L
SYMPHORICARPOS ALBUS (*)(CN)	SNOWBERRY	1 GAL	48" O.C.	L

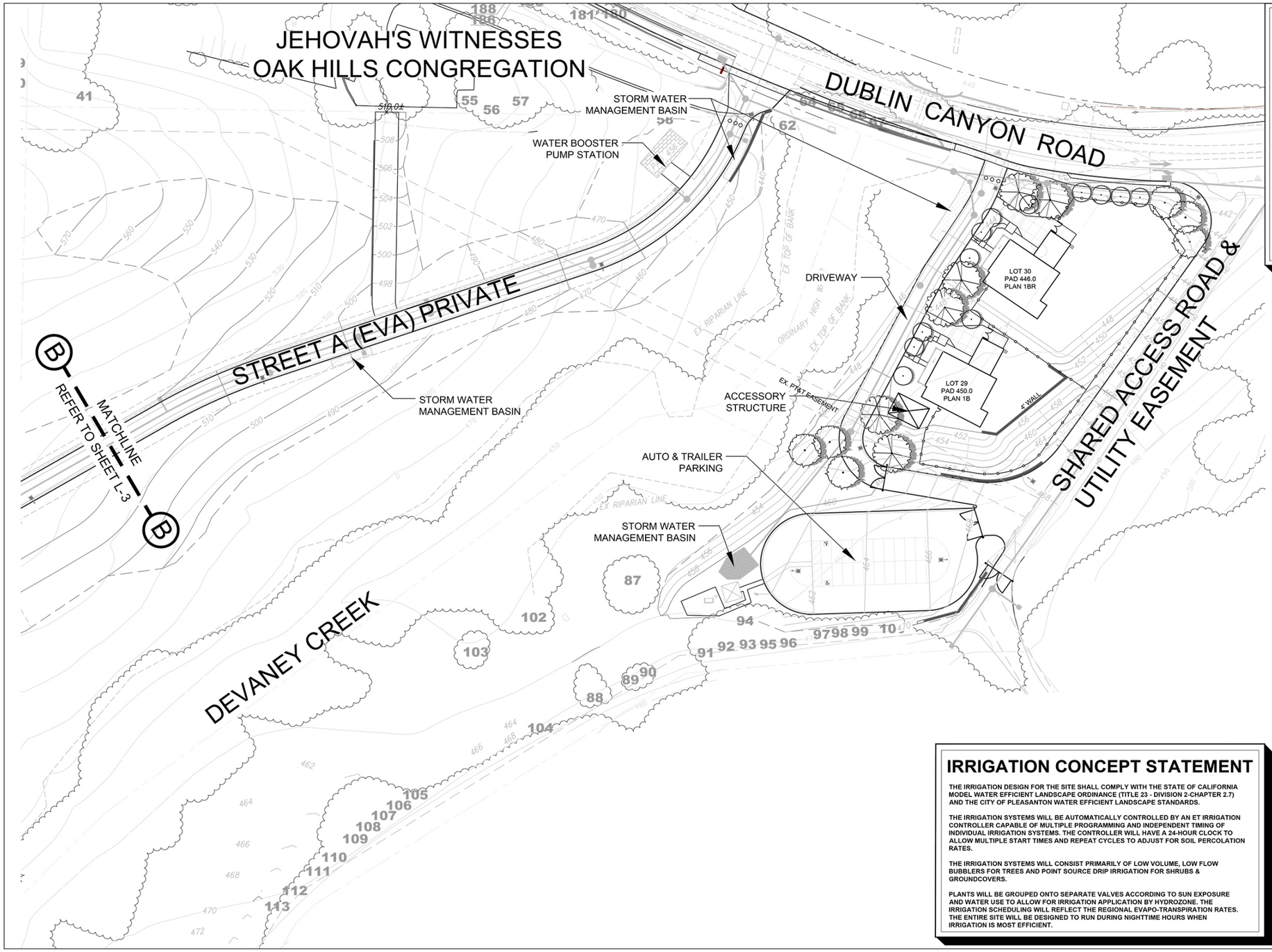
(*) PLANTS RECOMMENDED BY BAY FRIENDLY LANDSCAPES.
(CN) CALIFORNIA NATIVE PLANT.

Source: vanderToolen Associates, March 20, 2023.

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Exhibit 2-9c
Conceptual Landscape Plan

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PROPOSED TREE LEGEND

SYMBOL	BOTANICAL NAME	COMMON NAME	MIN. SIZE	WUCOLS REGION 1
	CERCIS OCCIDENTALIS (*)(CN)	WESTERN REDBUD	24" BOX	VL
	LAGERSTROEMIA INDICA VARIETIES	CRAPE MYRTLE	15 GAL	L
	OLEA EUROPAEA 'SWAN HILL' (MULTI TRUNK)	FRUITLESS OLIVE	36" BOX	VL
	PINUS HALEPENSIS	ALEPPO PINE	24" BOX	L
	PISTACIA CHINENSIS	CHINESE PISTACHE	24" BOX	L
	PLATANUS RACEMOSA (CN)	CALIFORNIA SYCAMORE	24" BOX	M
	POPULUS FREMONTII (CN)	WESTERN COTTONWOOD	24" BOX	M
	PRUNUS C. 'KRAUTER VESUVIUS'	PURPLE LEAF PLUM	15 GAL	L
	QUERCUS AGRIFOLIA (*)(CN)	COAST LIVE OAK	24" BOX	VL

(*) PLANTS RECOMMENDED BY BAY FRIENDLY LANDSCAPES.
(CN) CALIFORNIA NATIVE PLANT.

PROPOSED PLANT PALETTE

BOTANICAL NAME	COMMON NAME	MIN. SIZE	SPACING	WUCOLS REGION 1
SHRUBS AND PERENNIALS				
ARCTOSTAPHYLOS 'SUNSET' (*)(CN)	SUNSET MANZANITA	5 GAL	72" O.C.	L
BERBERIS THUNBERGII VARIETIES (*)	JAPANESE BARBERRY	1 GAL	30" O.C.	L
CALLISTEMON VIMINALIS 'LITTLE JOHN'	DWARF BOTTLEBRUSH	1 GAL	36" O.C.	L
CAREX SPECIES (*)(CN)	SEDGE	1 GAL	24" O.C.	L
CISTUS SPECIES (*)	ROCKROSE	1 GAL	48" O.C.	L
COLEONEMA SPECIES	BREATH OF HEAVEN	1 GAL	48" O.C.	M
EPILOBIUM CALIFORNICA (CN)	CALIFORNIA FUCHSIA	1 GAL	30" O.C.	L
ESCALLONIA SPECIES	N.C.N.	1 GAL	42" O.C.	M
FESTUCA SPECIES (*)	FESCUE	1 GAL	30" O.C.	L
FREMONTODENDRON SPECIES (*)(CN)	FLANNEL BUSH	5 GAL	10' O.C.	VL
HEMEROCALLIS HYBRID VARIETIES	DAYLILY	1 GAL	42" O.C.	M
HETEROMELES ARBUTIFOLIA (*)(CN)	TOYON	5 GAL	15' O.C.	VL
JUNIPERUS SPECIES	JUNIPER	1 GAL	48" O.C.	L
LAVANDULA SPECIES (*)	LAVENDER	1 GAL	36" O.C.	L
LOROPETALUM CHINENSE VARIETIES	FRINGE FLOWER	5 GAL	60" O.C.	L
MAHONIA AQUIFOLIUM VARIETIES (*)(CN)	OREGON GRAPE	1 GAL	60" O.C.	M
NANDINA DOMESTICA VARIETIES	HEAVENLY BAMBOO	1 GAL	30" O.C.	L
PHORMIUM HYBRIDS	NEW ZEALAND FLAX	5 GAL	48" O.C.	L
PITTOSPORUM SPECIES	MOCK ORANGE	5 GAL	36" O.C.	M
PRUNUS CAROLINIANA 'COMPACTA'	COMPACT CHERRY LAUREL	5 GAL	84" O.C.	L
RHAMNUS CALIFORNICA (*)(CN)	COFFEEBERRY	5 GAL	60" O.C.	L
SALVIA SPECIES (*)	SAGE	1 GAL	36" O.C.	L
WESTRINGIA FRUTICOSA VARIETIES (*)	COAST ROSEMARY	1 GAL	36" O.C.	L
VINES				
TRACHELOSPERMUM SPECIES	STAR JASMINE	1 GAL	8' O.C.	M
WISTERIA SPECIES (*)	WISTERIA	1 GAL	10' O.C.	M
GROUNDCOVERS				
BACCHARIS SPECIES (*)(CN)	DWARF COYOTE BRUSH	1 GAL	7' O.C.	L
CEANOTHUS SPECIES (*)(CN)	WILD LILAC	1 GAL	8' O.C.	L
MYOPORUM PARVIFOLIUM VARIETIES (*)	CREEPING MYOPORUM	1 GAL	6' O.C.	L
ROSMARINUS OFFICINALIS VARIETIES (*)	ROSEMARY	1 GAL	6' O.C.	L
BIORETENTION				
ACHILLEA MILLEFOLIUM (*)(CN)	YARROW	1 GAL	24" O.C.	L
BOUTELOUA GRACILIS VARIETIES (CN)	BLUE GRAMA GRASS	1 GAL	24" O.C.	L
CAREX SPECIES (*)(CN)	SEDGE	1 GAL	24" O.C.	L
EPILOBIUM CANUM (*)(CN)	CALIFORNIA FUCHSIA	1 GAL	30" O.C.	L
FESTUCA SPECIES (*)(CN)	FESCUE	1 GAL	30" O.C.	L
JUNCUS SPECIES (*)(CN)	RUSH	1 GAL	30" O.C.	M
LAVATERA SPECIES (*)	BUSH MALLOW	5 GAL	72" O.C.	L
MIMULUS SPECIES (*)(CN)	MONKEYFLOWER	1 GAL	36" O.C.	L
SYMPHORICARPOS ALBUS (*)(CN)	SNOWBERRY	1 GAL	48" O.C.	L

(*) PLANTS RECOMMENDED BY BAY FRIENDLY LANDSCAPES.
(CN) CALIFORNIA NATIVE PLANT.

IRRIGATION CONCEPT STATEMENT

THE IRRIGATION DESIGN FOR THE SITE SHALL COMPLY WITH THE STATE OF CALIFORNIA MODEL WATER EFFICIENT LANDSCAPE ORDINANCE (TITLE 23 - DIVISION 2-CHAPTER 2.7) AND THE CITY OF PLEASANTON WATER EFFICIENT LANDSCAPE STANDARDS.

THE IRRIGATION SYSTEMS WILL BE AUTOMATICALLY CONTROLLED BY AN ET IRRIGATION CONTROLLER CAPABLE OF MULTIPLE PROGRAMMING AND INDEPENDENT TIMING OF INDIVIDUAL IRRIGATION SYSTEMS. THE CONTROLLER WILL HAVE A 24-HOUR CLOCK TO ALLOW MULTIPLE START TIMES AND REPEAT CYCLES TO ADJUST FOR SOIL PERCOLATION RATES.

THE IRRIGATION SYSTEMS WILL CONSIST PRIMARILY OF LOW VOLUME, LOW FLOW BUBBLERS FOR TREES AND POINT SOURCE DRIP IRRIGATION FOR SHRUBS & GROUNDCOVERS.

PLANTS WILL BE GROUPED ONTO SEPARATE VALVES ACCORDING TO SUN EXPOSURE AND WATER USE TO ALLOW FOR IRRIGATION APPLICATION BY HYDROZONE. THE IRRIGATION SCHEDULING WILL REFLECT THE REGIONAL EVAPO-TRANSPIRATION RATES. THE ENTIRE SITE WILL BE DESIGNED TO RUN DURING NIGHTTIME HOURS WHEN IRRIGATION IS MOST EFFICIENT.

FENCE LEGEND

- 6' HIGH WOOD GATE.
- 6' HIGH WOOD GOOD NEIGHBOR FENCE.
- 6' HIGH VIEW FENCE.
- DECORATIVE ORNAMENTAL IRON FENCE.

Source: vanderToolen Associates, March 20, 2023.

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Source: vanderToolen Associates, March 20, 2023.

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Exhibit 2-9e
Conceptual Landscape Plan

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2.3.5 - Infrastructure Improvements

Domestic Water

The proposed project would be served by water from the City, via connection to the Moller 770 Pressure Zone. The proposed project would require extension of public water on-site. Eight-inch water mains are proposed along Streets A and B, continuing along the EVA portion of Street A, and also within Court C. An 8-inch water main is also proposed to follow both the private and public roads surrounding the proposed lots 29 and 30, connecting the roads along Dublin Canyon Road. Water would also be provided to the facilities at the proposed EBRPD Staging Area.

Sanitary Sewer

The City would provide sewer services to the proposed project. An 8-inch sanitary sewer lateral exists underneath Dublin Canyon Road. The proposed project would require extension of sewer systems on-site. Eight-inch sanitary sewer laterals are proposed along Streets A and B, continuing along the EVA portion of Street A, and within Court C. An 8-inch sanitary sewer lateral is also proposed underneath the private road to lots 29 and 30.

Stormwater Drainage

The proposed project includes bioretention areas and vaults for on-site stormwater management throughout the development site, including near the proposed main entrance from Dublin Canyon Road and along internal private Street A; see Exhibit 2-9 through 2-9e. Throughout the development site, proposed storm drains would connect to the bioretention areas for pre-treatment before connecting to the City's existing storm drainage system off-site, including a 12-inch storm drain within Dublin Canyon Road. A new 24-inch storm drain is proposed along Dublin Canyon Road, which would connect to the development site via 12-inch storm drains. An 18-inch storm drain is also proposed at the intersection of Street A and Street B and following Street A; 12- and 8-inch storm drains are proposed within Court C. A 12-inch storm drain is proposed to follow both the private and public roads surrounding lots 29 and 30, connecting the roads along Dublin Canyon Road.

Solid Waste and Recycling Collection

Pleasanton Garbage Services (PGS) serves residential and commercial locations in the City. Service is provided on a weekly basis. Each residential household would be provided with a garbage cart and recycling cart.

Power and Telecommunications

Other services would include power in the form of gas and electrical service provided by Pacific Gas & Electric (PG&E). Telecommunications providers include Pacific Bell Telephone Company, Xfinity, and AT&T. An existing 20-foot communications easement is located within the central portion of the project site.

2.3.6 - Construction

Construction is estimated to occur in five sub-phases, beginning in the first quarter of 2026 and ending in the second quarter of 2028, as summarized in Table 2-3. Residential construction would

occur in one phase and would involve the removal of accessory structures and two existing residential structures owned and occupied by the Lester family at the northeastern portion of the site.

Table 2-3: Estimated Construction Schedule

Construction Activity	Phase Start Date	Phase End Date	Working Days per Week	Total Number of Working Days
Site Preparation (Tree Removal, demolition)	1/6/2026	1/16/2026	5	12
Grading	3/30/2026	5/15/2026	5	35
Building Construction	9/1/2026	8/1/2028	5	460
Paving	8/3/2026	8/14/2026	5	10
Architectural Coating	12/30/2026	5/1/2028	5	60
Source: Ruggeri-Jensen-Azar. 2023.				

Site Preparation and Grading

Grading would cover approximately 21.2 acres, and approximately 129,850 cubic yards of material would be generated from grading activities to construct the lots, streets, and foundations. Another 14,630 cubic yards of material would be generated by trench spoils and anticipated soil swelling (5 percent), for a total of 142,200 cubic yards of cut and fill work. As a result, the site grading would be balanced and neither off-haul nor import of dirt would be required.

Grading on the development site and open space has been designed to avoid potential impacts to Devany Creek and associated vegetation and to provide a transition to the natural grades beyond the building envelopes. All site grading on the Lester property has been designed to eliminate grading within areas of 25 percent slope or greater except for grading required to construct small road segments at the Dublin Canyon Road entrance and a portion along the EVA.

The development site is predominantly grassland and is barely visible to the public from Dublin Canyon Road or other surrounding areas. The proposed project would balance cut and fill across the site, with no import or export of materials proposed.

Staging and Access

Construction traffic would utilize Dublin Canyon Road to access the development site. Equipment staging would occur along Dublin Canyon Road where feasible and on the site of the future trailhead and parking area.

Hours

Construction hours would conform to Pleasanton Municipal Code requirements and would occur between 8 a.m. and 8 p.m. Monday through Saturday. Limited construction could occur on Sundays and holidays with pre-approval by the Chief Building Official.

2.4 - Required Actions and Approvals

The proposed project would require the following discretionary and ministerial permits and approvals.

2.4.1 - Discretionary Actions

Discretionary approvals and permits are required by the Lead Agency, the City of Pleasanton, for implementation of the proposed project and include the following:

- EIR Certification: City Council.
- Approve general plan amendment, rezoning, and growth management allocation: City Council
- Approve annexation, subdivision, and development plans: City Council
- Issue architectural review permit: City Council
- Approve street and sidewalk improvements: City Public Works and Community Development Department
- Approve water, sewer, stormwater, and street light improvements: City Public Works and Community Development Department

2.4.2 - Ministerial Actions

- Demolition permit: City Building Inspection Department
- Grading permits: City Engineering Department
- Building permits: City Building Inspection Department

A number of other agencies in addition to the City of Pleasanton would serve as Responsible and Trustee Agencies pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15381 and Section 15386, respectively. This EIR provides environmental information to these agencies—and other public agencies—that may be required to review and approve or coordinate actions as part of project implementation. These agencies may include but are not limited to the following:

- Alameda County LAFCo
- EBRPD
- San Francisco Bay Regional Water Quality Control Board (San Francisco Bay RWQCB) and United States Army Corps of Engineers (USACE) with respect to wetland permits
- Alameda County Flood Control and Water Conservation District (Zone 7 Water Agency or Zone 7)
- Alameda County Department of Environmental Health (ACDEH)
- Alameda County Fish and Wildlife (ACFW) (special-status species)
- California Department of Fish and Wildlife (CDFW)
- Dublin-San Ramon Services District (DSRSD)

- Livermore-Amador Valley Wastewater Management Agency Wastewater Disposal (LAVWMA)
- PGS
- PG&E
- Livermore-Pleasanton Fire Department (LPFD)
- Pleasanton Police Department (PPD)
- Pleasanton Unified School District (PUSD)

2.5 - Intended Uses of This Draft EIR

This Draft EIR is being prepared by the City of Pleasanton to assess the potential environmental impacts that may arise in connection with actions related to project implementation. Pursuant to CEQA Guidelines Section 15367, the City of Pleasanton is the Lead Agency for the proposed project and has discretionary authority over the proposed project and project approvals. The Draft EIR is intended to address proposed public infrastructure improvements and future development that are within the parameters of the proposed project as well as any required approvals necessary to implement the proposed project. This document will also serve as a basis for soliciting comments and input from members of the public and public agencies regarding the proposed project. The Draft EIR will be circulated for a minimum of 45 days, during which period comments concerning the analysis contained in the Draft EIR should be sent to:

Natalie Amos, Associate Planner
City of Pleasanton
Community Development Department
P.O. Box 520
Pleasanton, CA 94566

CHAPTER 3: ENVIRONMENTAL IMPACT ANALYSIS

Organization of Issue Areas

This Draft Environmental Impact Report (Draft EIR) provides analysis of impacts for those environmental topics where it was determined in the Notice of Preparation (NOP), or through subsequent analysis, that the proposed project would result in "potentially significant impacts." Sections 3.1 through 3.16 discuss the environmental impacts that may result with approval and implementation of the proposed project.

Issues Addressed in this Draft EIR

The following environmental issues are addressed in Chapter 3:

- Aesthetics, Light, and Glare
- Air Quality
- Biological Resources
- Cultural Resources and Tribal Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services
- Recreation
- Transportation
- Utilities and Service Systems
- Wildfire

Level of Significance

Determining the severity of project impacts is fundamental to achieving the objectives of the California Environmental Quality Act (CEQA). CEQA Guidelines Section 15091 requires that decision-makers mitigate, as completely as is feasible, the significant impacts identified in the Draft EIR. If the EIR identifies any significant unmitigated impacts, CEQA Guidelines Section 15093 requires decision-makers in approving a project to adopt a statement of overriding considerations that explains why the benefits of the project outweigh the adverse environmental consequences identified in the Draft EIR.

The level of significance for each impact examined in this Draft EIR was determined by considering the predicted magnitude of the impact against the applicable threshold. Thresholds were developed using criteria from the CEQA Guidelines and checklist; State, federal, and local regulatory schemes; local/regional plans and ordinances; accepted practice; consultation with recognized experts; and other professional opinions.

Impact Analysis and Mitigation Measure Format

The format adopted in this Draft EIR to present the evaluation of impacts is described and illustrated below.

Summary Heading of Impact

Impact AES-1: **An impact summary heading appears immediately preceding the impact description (Summary Heading of Impact in this example). The impact number identifies the section of the report (AES for Aesthetics, Light, and Glare in this example) and the sequential order of the impact (1 in this example) within that section. To the right of the impact number is the impact statement, which identifies the potential impact.**

Impact Analysis

A narrative analysis follows the impact statement.

Level of Significance Before Mitigation

This section identifies the level of significance of the impact before any mitigation is proposed.

Mitigation Measures

In some cases, following the impact discussion, reference is made to State and federal regulations and agency policies that would fully or partially mitigate the impact. In addition, policies and programs from applicable local land use plans that partially or fully mitigate the impact may be cited.

Project-specific mitigation measures, beyond those contained in other documents, are set off with a summary heading and described using the format presented below:

MM AES-1 Project-specific mitigation is identified that would reduce the impact to the lowest degree feasible. The mitigation number links the particular mitigation to the impact it is associated with (**AES-1** in this example); mitigation measures are numbered sequentially.

Level of Significance After Mitigation

This section identifies the resulting level of significance of the impact following mitigation.

Abbreviations used in the mitigation measure numbering are as follows:

Code	Environmental Issue
AES	Aesthetics, Light, and Glare
AIR	Air Quality
BIO	Biological Resources
CUL	Cultural Resources and Tribal Cultural Resources
ENER	Energy
GEO	Geology, Soils, and Seismicity
GHG	Greenhouse Gas Emissions

Code	Environmental Issue
HAZ	Hazards and Hazardous Materials
HYD	Hydrology and Water Quality
LAND	Land Use
NOI	Noise
PUB	Public Services
REC	Recreation
TRANS	Transportation
UTIL	Utilities and Service Systems
WILD	Wildfire

Cumulative Effects

CEQA Guidelines Section 15130 requires the consideration of cumulative impacts within an EIR when a project's incremental effects are cumulatively considerable. According to CEQA, ". . . the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." In identifying projects that may contribute to cumulative impacts, CEQA allows the use of a list of past, present, and reasonably anticipated future projects which have the potential to result in related or cumulative impacts, including those which are outside of the control of the lead agency.

In accordance with CEQA Guidelines Section 15130(b), ". . . the discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, the discussion need not provide as great [a level of] detail as is provided for the effects attributable to the project alone." The discussion should be guided by standards of practicality and reasonableness, and it should focus on the cumulative impact to which the identified other projects contribute rather than on the attributes of other projects that do not contribute to the cumulative impact.

The proposed project's cumulative impacts were considered in conjunction with other proposed and approved projects in the vicinity of the project site, including the County of Alameda (County) and the City of Pleasanton (City).

3.1.1 - Cumulative Project List

Although the physical conditions existing when the NOP is published normally are used to establish the baseline for the analysis of cumulative impacts (CEQA Guideline § 15125 (a)(1)), the City has sole discretion to determine which projects to include in a cumulative impact project list. In exercising its discretion, the City is guided by the basic standard that the cumulative list should include projects when it is reasonable, feasible, and practical to do so, given the information available about the projects, and when failure to include such projects would lead to an inadequate analysis of the severity and significance of the cumulative impacts in question. *Golden Door Props., LLC v. County of San Diego* (2020) 50 CA5th 467, 529. The City also notes that the CEQA Guidelines specify that

location may be an important factor when the location of other projects determines whether they contribute to an impact.

Accordingly, to provide a robust analysis of the potential significance of cumulative development, the County's list of cumulative projects is based on several factors, including the nature of the resource affected, the location of the project, and the type of project, consistent with the direction in CEQA Guidelines Section 15130(b)(2).

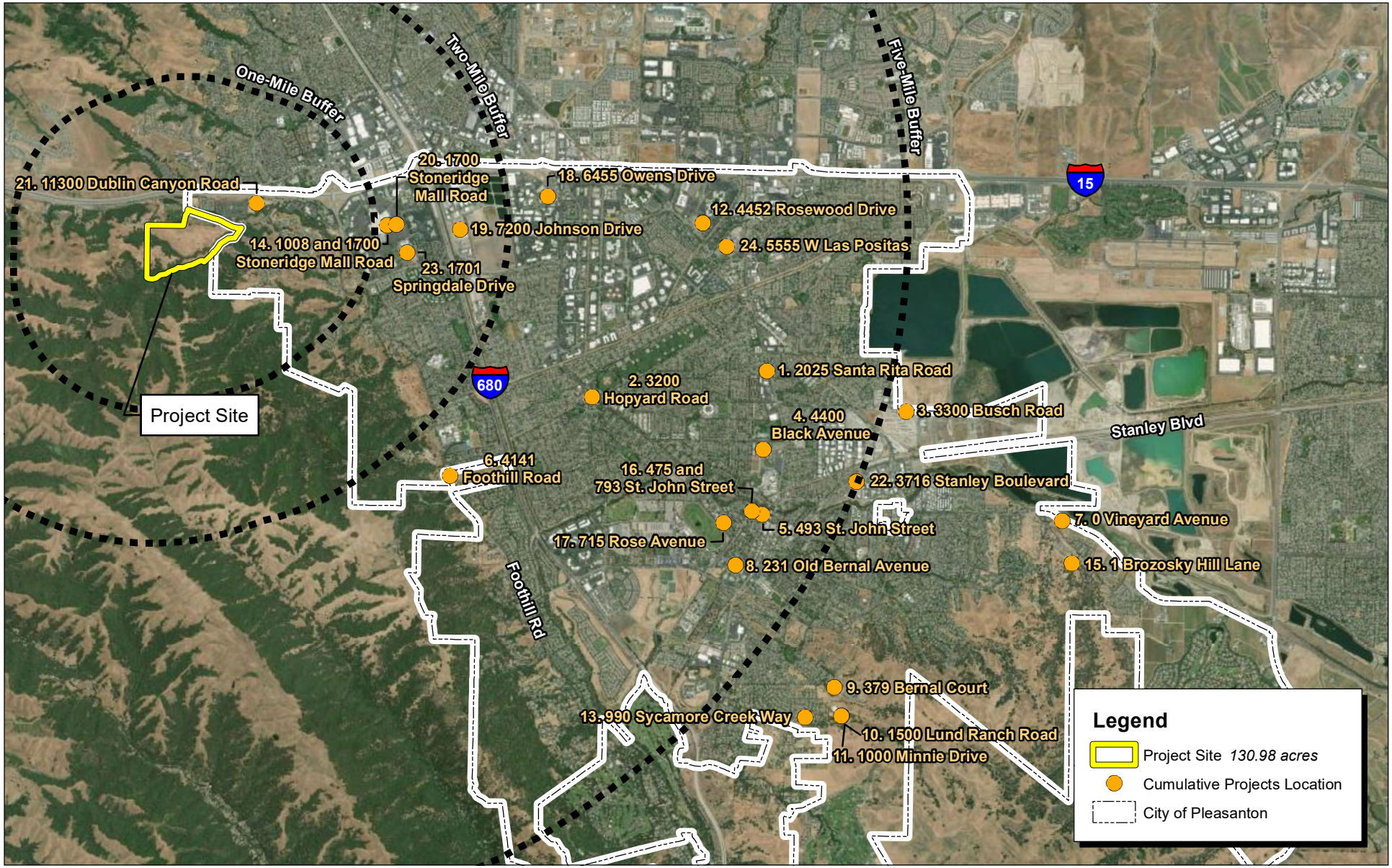
Table 3-1, Cumulative Projects, below, provides a list of the projects considered in the cumulative analysis. Generally, past projects are not included within the list of cumulative projects due to the fact that current environmental conditions are already considered as part of the baseline and existing environmental condition. All of the projects are located within the Pleasanton city limits. A map showing the locations of these cumulative projects is included as Exhibit 3-1.

Table 3-1: Cumulative Projects

#	Project	Characteristics	Location	Distance from Project (miles)	Quantity (units)	Quantity (square feet)	Status
1	Harmony Condominium Project	Residential–Multi-family	2025 Santa Rita Road	4.12	42	—	Approved
2	3200 Hopyard Residential Project	47 townhome units; eight affordable apartments	3200 Hopyard Road	3.04	55	—	Approved
3	3330 Busch Road Project	Residential–Single-family; 310 single-family units; 102 affordable apartments	3300 Busch Road	5.35	412	—	Approved
4	4440 Black Avenue Project	Residential-Multi-family; 59 townhome units and seven ADUs	4400 Black Avenue	4.38	66	—	Under Review
5	Barone's/Robson Homes	Mixed-use	475 and 493 St. John Street	4.88	14	3,125	Under Construction
6	Merritt Property Residential Subdivision	Residential–Single-family	4141 Foothill Road	2.43	11	—	Approved
7	PUSD Vineyard Project	Residential–Single-family; park	0 Vineyard Avenue	6.67	27	130,680	Approved
8	231 Old Bernal Avenue Project	Mixed-use	231 Old Bernal Avenue	4.58	1	3,000	Under Review
9	379 Bernal Court Project	Residential–Multi-family	379 Bernal Court	5.70	8	—	Under Review
10	Lund Ranch II	Residential–Single-family	1500 Lund Ranch Road	5.88	43	—	Under Construction
11	Sportorno Ranch Project	Residential–Single-family	1000 Minnie Drive	5.88	22	—	Approved
12	Avalon Bay Project	Residential–Multi-family	4452 Rosewood Drive	3.47	451	10,000	Under Construction
13	Bringhurst/ Sycamore Corner Project	Residential–Single-family	990 Sycamore Creek Way	5.65	5	—	Approved
14	Stoneridge Mall Housing Project	Residential–Multi-family	1008 and 1700 Stoneridge Mall Road	1.09	306	—	Approved
15	1 Brozosky Hill Lane Project	Residential–Single-family	1 Brozosky Hill Lane	6.88	4	—	Under Review
17	715 Rose Avenue Project	Residential–Multi-family	715 Rose Avenue	4.34	4	—	Approved

#	Project	Characteristics	Location	Distance from Project (miles)	Quantity (units)	Quantity (square feet)	Status
18	6455 Owens Drive Project	Commercial	6455 Owens Drive	2.34	—	10,980	Under Construction
19	7200 Johnson Drive Project	Commercial	7200 Johnson Drive	1.67	—	148,613	Under Construction
20	Stoneridge Mall Commercial Project	Commercial	1700 Stoneridge Mall Road	1.19	—	255,420	Approved
21	Greek Orthodox Church Project	Commercial–Greek Orthodox Church and Community Center	11300 Dublin Canyon Road	0.28	—	34,713	Approved
22	Public Storage Project	Commercial	3716 Stanley Boulevard	5.13	—	205,027	Under Construction
23	10X Genomics Project	Commercial	1701 Springdale Drive	1.28	—	381,000	Approved
24	Stanford Health Care Project	Commercial	5555 W Las Positas	3.68	—	66,000	Under Review
				Total Cumulative Development	**1,503**	**1,243,578**	—

Source: City of Pleasanton. 2024. Current Development Projects. November.



Source: ESRI Aerial Imagery

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5,500 2,750 0 5,500 Feet

Exhibit 3-1
Cumulative Project Map

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3.1.2 - Cumulative Impact Format

The cumulative impact discussions in Sections 3.1 through 3.16 explain the geographic scope of the area affected by each cumulative effect (e.g., immediate project vicinity, City, planning area, County, watershed, or air basin). The geographic area considered for each cumulative impact depends upon the impact that is being analyzed. For example, in assessing noise impacts, the geographic study area is more local and includes the immediate vicinity of the areas of new development. In assessing air quality impacts, all development within the air basin contributes to regional emissions of criteria pollutants and basin-wide projections of emissions is the best tool for determining cumulative effect.

After establishing the relevant geographic scope, this analysis evaluates whether the impacts of the proposed project, together with the impacts of cumulative development, would result in a cumulatively significant impact. This analysis then considers whether incremental contribution to cumulative impacts associated with the implementation of the proposed project would be significant. Both conditions must apply for a project's cumulative effects to rise to the level of significance. Under CEQA Guidelines Section 15130(a)(2), where a project contributes to a cumulative impact but the combined cumulative impact with the project's incremental effect is not significant, the EIR must only "briefly indicate" why the cumulative impact is not significant. Similarly, if the proposed project has no impact associated with respect to a particular CEQA threshold, the project would not contribute to any potential cumulative impact and a detailed discussion is not required.

The cumulative impacts discussions in Section 3.1 through 3.16 are located at the end of each section, after the project-specific analysis.

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3.1 - Aesthetics, Light, and Glare

3.1.1 - Introduction

This section describes the existing aesthetics, light, and glare conditions in the project area, as well as the relevant regulatory framework. This section also evaluates the possible impacts related to aesthetics that could result from implementation of the proposed project. Descriptions and analysis in this section are based on site reconnaissance by FirstCarbon Solutions, as well as review of the City of Pleasanton General Plan (General Plan), General Plan Final Environmental Impact Report (General Plan FEIR), and City of Pleasanton Municipal Code (Municipal Code). Seven public comments were received during the Environmental Impact Report (EIR) scoping period related to aesthetics.

- Requests for impacts to hillside views from adjacent properties to be analyzed in the Draft EIR.
- Request for three-dimensional visual simulations to show how the proposed project would impact hillside views.
- Request to see plans for the placement of mature trees throughout and adjacent to the project site.
- Request that City staff and Commissioners meet on-site with residents who are concerned about view impacts.
- Concerns related to the meadow, which have been addressed with the change in location of the staging area.
- Concerns related to the fencing proposed for the homes around the lots, stating it would create terrain disfigurement.
- Requested a photo montage for the before/after presentation of the landscape with homes and fencing, which is part of the Alameda County Agricultural Site Development Review Process.

3.1.2 - Environmental Setting

Visual Character

Regional Setting

The project site is located within the greater San Francisco Bay Area, in the eastern valley of Alameda County, approximately 32 miles southeast of Oakland just outside the city limits of the City of Pleasanton. Residential development within the vicinity of the project site includes both older single-family residences and more recently developed subdivisions. The project site is also located near Pleasanton Ridge Regional Park, a 9,090-acre recreation and open space area with a large trail system.[1]

[1] East Bay Regional Park District (EBRPD) 2025. Pleasanton Ridge Regional Park. Website: https://www.ebparks.org/parks/pleasanton-ridge. Accessed July 9, 2025.

Project Site

The project site is located just outside the northwest city limits of the City of Pleasanton, within an area characterized by residential and open space/agricultural land uses and sloping hills and creeks. The overall project site is approximately 130.98 acres of undeveloped land and is surrounded by agricultural open space, Dublin Canyon Road, and a Kingdom Hall of Jehovah's Witnesses (north), open space and residential uses (east), rural residential and an East Bay Regional Park District (EBRPD) land bank (south), and agricultural open space (west). The project site contains Devany Creek and Canyon.

Visual Distance Zones

The following distance zones (foreground, middle ground, and background) characterize the dominant visual character from each vantage point and describe views in terms that can be analyzed and compared. The sensitivity of views, which may be modified by the proposed project, are defined in order to establish thresholds for the analysis of potential visual impacts resulting from the implementation of the proposed project.

Foreground Views

These views include elements that can be seen at a close distance and dominate the entire view. Viewer groups affected by changes in views, such as surrounding residents, pedestrians, or regular motorists are most impacted by modified views at this distance.

Middle Ground Views

These views include elements that can be seen at a middle distance and that partially dominate the view. A sensitive viewer group would consider these impacted views potentially adverse.

Background Views

Although background views are part of the overall visual composition of the view, these views include elements that are seen at a long distance and typically do not dominate the view. A sensitive viewer group would consider these impacted views potentially adverse.

Scenic Resources

The City of Pleasanton is located mostly within the Amador Valley, one of the three valleys constituting the Tri-Valley. The Tri-Valley, outlined by the Diablo Range of hills, is a sheltered inland valley. Hills ranging from 1,000 to 1,500 feet in elevation (including the Pleasanton and Main Ridges) border the valley floor to the west and east. The Las Trampas Ridge is also visible to the northwest. To the north lies the Black Hills, including Mount Diablo (elevation 3,948 feet), and to the south the valley rises up to 3,500 feet. These surrounding scenic resources define the high points of the Tri-Valley area and provide a scenic backdrop for all development in the valley floor portions of the Planning Area. Agricultural land uses that primarily consist of grazing lands along with some vineyards are located in the western and southern hills next to the City.

The General Plan identifies scenic highways in lieu of identifying scenic vistas, as they also afford publicly available views. A scenic highway protects scenic value and provides passive recreation in observing scenic vistas. The nearest scenic highway to the project site is Interstate 680 (I-680),

located approximately 1.6 miles northeast of the project site; I-580 is an Eligible State Scenic Highway approximately 0.32 mile north of the project site.[2]

Additionally, the General Plan recognizes arroyos, ridge views, hillsides, and open space areas as general scenic resources.

3.1.3 - Regulatory Framework

State

Title 24 of the California Code of Regulations Building Energy Efficiency Standards

California Building Standards Code (California Code of Regulations [CCR] Title 24)—including Part 6—includes Section 132 of the Building Energy Efficiency Standards, which regulates lighting characteristics, such as maximum power and brightness, shielding, and sensor controls to turn lighting on and off. Different lighting standards are set by classifying areas by lighting zone (LZ). The classification is based on population figures of the 2000 Census. Areas can be LZ1 (dark), LZ2 (rural), or LZ3 (urban). Lighting requirements for dark and rural areas are stricter in order to protect the areas from new sources of light pollution and light trespass.

California Scenic Highway Program

I-680 is a designated scenic highway, from the Contra Costa County line southward to Mission Boulevard; this includes the section of I-680 that passes by the project area. The State Legislature created the California Scenic Highway Program, maintained by the California Department of Transportation (Caltrans), in 1963. The purpose of the State Scenic Highway Program is to protect and enhance the natural scenic beauty of California highways and adjacent corridors, through special conservation treatment. The State laws governing the Scenic Highway Program are in the Streets and Highways Code, Sections 260 through 263. A highway may be designated scenic depending upon how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view. The State Scenic Highway System includes a list of highways that are either eligible for designation as scenic highways or have been officially designated. The status of a proposed State scenic highway changes from eligible to officially designated when the local governing body applies to Caltrans for scenic highway approval, adopts a Corridor Protection Program, and receives notification that the highway has been officially designated a Scenic Highway.

Local

Pleasanton General Plan

The General Plan establishes the following goals, policies, and programs related to aesthetics, light, and glare that are applicable to the proposed project:

Land Use Element

Policy 21 Preserve scenic hillside and ridge views of the Pleasanton ridgelands and Southeast Hills.

[2] City of Pleasanton. 2015. Pleasanton General Plan 2005–2025. January 6.

Open Space and Conservation Element

Policy 8 Preserve as permanent open space all areas of outstanding scenic qualities or areas which provide extraordinary views of natural and human-made objects.

Program 8.2 Retain the scenic attributes of existing (I-680) and proposed scenic highways (I-580 and State Route 84) including views of woodlands, hills and ridges, valleys, and grazing lands.

Program 8.5 Encourage developers to work with entities such as the Tri-Valley Conservancy to dedicate scenic/conservation easements for private open-space areas possessing exceptional natural, scenic, and/or vegetation or wildlife habitat qualities.

Program 8.6 Encourage developers to provide open-space buffers in areas where there are conflicting land uses.

Program 9.1 Light only those trails in natural areas that provide a reasonable alternative to transportation, or important links, between residential areas, parks, and commercial centers, as long as such lighting does not intrude upon environmentally sensitive areas or impact nearby residents.

Community Character Element

Goal 7 Preserve the open space character at the edges of the City.

Policy 19 Require that design of new residential development in hillside areas complement the natural appearance of the open space.

Policy 20 Preserve scenic hillside and ridge views, and other natural features in the hills.

Program 20.2 In new developments, preserve scenic hillsides and other hillside features including ridges, plants, streams, and wildlife.

Program 20.3 Discourage grading on slopes of 25 percent or greater.

Pleasanton Municipal Code

Municipal Code Chapter 18.20 sets forth requirements related to design review, including types of projects that are subject to review, the scope of review, and the procedures by which review occurs.

3.1.4 - Methodology

This analysis provides a discussion of the visual impacts associated with the proposed project and its potential effect upon the area surrounding the project site. Several variables affect the degree of visibility, visual contrast, and ultimately project impacts: (1) scale and size of facilities, (2) viewer types and activities, (3) distance and viewing angle, and (4) influences of adjacent scenery or land uses. Viewer response and sensitivity vary depending on viewer attitudes and expectations. Viewer sensitivity is distinguished among project viewers in identified scenic corridors and from publicly

accessible recreational and plaza areas. Recreational areas and scenic corridors are considered to have relatively high sensitivity.

FirstCarbon Solutions (FCS) evaluated potential project impacts on aesthetics, light, and glare through site reconnaissance and review of applicable plans and policies. Additionally, FCS reviewed project site plans and coordinated with the City of Pleasanton staff to identify representative view corridors/viewpoints near and on the project site. FCS staff prepared "before" and "after" visual simulations of the proposed project as viewed from the selected viewpoints on Donlon Point Trail, Dublin Canyon Road, Canyon Creek Circle, Kolb Ranch Drive, and Crosby Drive. "Before" images consist of photographs of the project site depicting existing conditions. "After" images consist of computer-generated images that incorporate proposed site and architectural plans for the proposed project.

Light and Glare

The analysis of light and glare impacts in this section focuses on the nature and magnitude of changes in light and glare conditions of the project site and surrounding area. If light and glare conditions of the proposed project and the existing environment are similar, then the visual compatibility would be high. If light and glare conditions of the proposed project strongly contrast with existing light and glare or applicable regulations, then light and glare compatibility would be low and significant impacts may result. Relevant urban design policies and guidelines are used to provide conclusions regarding significance of project- and cumulative-level light and glare impacts.

3.1.5 - Thresholds of Significance

The lead agency utilizes the criteria in the California Environmental Quality Act (CEQA) Guidelines Appendix G Environmental Checklist to establish thresholds of significance to determine whether impacts to aesthetics are significant environmental effects. As such, the City has determined that the proposed project would have a potential impact if it would:

a) Have a substantial adverse effect on a scenic vista.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a state scenic highway.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

3.1.6 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the development of the proposed project and provides mitigation measures where appropriate.

Scenic Vistas

Impact AES-1: The proposed project would not have a substantial adverse effect on a scenic vista.

Impact Analysis

Construction

For the purposes of this analysis, a significant impact would occur if project construction would result in substantial adverse effects on the view of a scenic resource/route as defined by the General Plan or General Plan FEIR. During construction, construction vehicles and staging would be present on the project site. However, construction equipment would not block any scenic resources or routes in the vicinity and construction would be temporary. As such, impacts would be considered less than significant.

Operation

For the purposes of this analysis, a significant impact would occur if project operation would result in substantial adverse effects on the view of a scenic resource/route as defined by the General Plan or General Plan EIR. Once constructed, the proposed project would introduce 28 new single-family homes and associated roadways and infrastructure on a currently undeveloped project site. Development of homes could interrupt scenic vistas from within and adjacent to the project site. However, such interruptions would be intermittent, and the majority of the site is proposed for open space dedication. Furthermore, the substantial portions of the site that are proposed for dedication to EBRPD would continue to provide visual corridors to surrounding scenic vistas. As such, impacts would be less than significant.

As previously mentioned, the nearest scenic highway to the project site is I-680, located approximately 1.6 miles northeast of the project site. Additionally, I-580 is an Eligible State Scenic Highway approximately 0.32 mile north of the project site.[3] Because of distance and existing intervening development, the proposed project would not be visible from either scenic route.

The General Plan recognizes arroyos, ridge views, hillsides, and open space areas as general scenic resources. Scenic resources visible from the project site include hillsides, ridgelines, and open spaces. To the north, scenic resources include background views of the Blackhawk Hills, part of the Diablo Range, and Mount Diablo. To the east, scenic resources include open spaces. To the west, scenic resources include background views of wooded hillsides and ridgelines. These scenic resources are primarily part of background views seen at a distance from the project site. Further, the proposed project would adhere to the Municipal Code and all applicable laws and regulations and development would be located within a lower topographic portion of the project site. The proposed project would not introduce development on hillsides in a manner that could obstruct views, and would maintain a majority of the project site as open space.

[3] City of Pleasanton. 2015. Pleasanton General Plan 2005–2025. January 6.

The proposed project is not expected to significantly block surrounding scenic resources or ridgelines for adjacent properties. Therefore, the proposed project would not have a substantial impact on a scenic vista; impacts would be considered less than significant.

Level of Significance

Less than significant impact.

Mitigation Measures

None.

Scenic Highways

Impact AES-2:	**The proposed project would not damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a state scenic highway.**

Impact Analysis

The project site consists of mostly undeveloped land, enclosed with a barbed-wire fence. There are no historic structures present on the project site. I-680, traversing Pleasanton in a north–south direction, and State Route (SR) 84, extending west of I-680, are both officially designated State Scenic Highways. I-580 is an Eligible State Scenic Highway but is not officially designated.[4] These three highways feature wooded hillsides and valleys and other open space.

Construction and Operation

A significant impact would occur if the proposed construction and operation would substantially damage scenic resources as seen from a designated scenic highway. The project site is located approximately 1.6 miles west of I-680, which is an officially Designated State Scenic Highway. The next closest officially Designated State Scenic Highway is SR-84, which is approximately 6.7 miles south of the project site.[5] Views of the project site are obstructed from both of these highways due to distance, existing commercial and residential developments, and topography. I-580, located less than a mile north of the project site, is an Eligible State Scenic Highway, but existing vegetation along the roadway obstructs views to the south. As such, no impacts to views of scenic resources from State Scenic Highways would occur.

Level of Significance

No impact.

Mitigation Measures

None.

[4] California Department of Transportation (Caltrans). 2018. California State Scenic Highway System Map. Website: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed July 9, 2025.

[5] Ibid.

Visual Character

Impact AES-3:	**The proposed project would not in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from publicly accessible vantage point), and would not conflict with applicable zoning and other regulations governing scenic quality.**

Impact Analysis

The project site itself is not urbanized, aside from two residences. The area to the north and east of the project site is residential and urbanized. I-580 is approximately 0.32 mile north of the project site. As a non-urbanized project site within a semi-urbanized area, this impact analysis addresses both consistency with regulations governing scenic quality, as well as changes to the existing visual character and quality.

The proposed project would construct 28 detached single-family residential units and roadways on approximately 23.89 acres. The proposed project would permanently preserve a total of 117.1 acres of open space for the Homeowners Association, dedication to EBRPD, and for private retention by the Lester family. The proposed EBRPD dedication would include building a public staging area at the eastern corner of the project site to provide access to a trail connection to Pleasanton Ridge Regional Park.

Construction

Construction activities could temporarily affect the existing visual character or quality of the project site and area due to the presence of equipment and vehicles on the project site; however, the construction of the proposed project would only temporarily affect the visual character and quality of the area and all temporary impacts would cease upon conclusion of construction.

There are no zoning regulations or General Plan policies related to aesthetic impacts during construction. Construction staging and grading plans would be reviewed and approved by the Town prior to construction. Thus, construction impacts would be less than significant.

Operation

FCS staff produced visual simulations to show the proposed project's visual impacts at full buildout compared to the existing conditions. The visual simulations show views of the project site from several viewpoints around the project area to demonstrate the proposed project's potential impacts to foreground, middle ground, and background views. The City of Pleasanton Planning Department staff selected the viewpoints as representative of the possible views that could be affected by the proposed project. Exhibit 3.1-1 shows the keymap for where viewpoints were photographed and the direction they capture.



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Exhibit 3.1-1
Visual simulation Keymap

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The most prominent scenic views in the area include those of the hillsides and ridgelines belonging to the Pleasanton Ridge Regional Park. According to the visual simulations, the proposed project would not significantly change the views available from the viewpoints on Donlon Point Trail, Dublin Canyon Road, Canyon Creek Circle, Kolb Ranch Drive, and Crosby Drive. Existing views of hillsides surrounding the project site are currently obstructed from several of the viewpoints by existing vegetation and residential development. The proposed project would be visible from the viewpoint at the project entrance on Dublin Canyon Road, and the viewpoint on Crosby Drive. Exhibit 3.1-2 shows the proposed views of the project site from Crosby Drive. As shown in the visual simulation, the proposed project would provide landscaping and trees that would enhance views of the project site and promote harmony with the existing landscape. From Dublin Canyon Road, existing vegetation obstructs much of the hillsides surrounding the proposed project, and proposed vegetation at the project entrance would similarly obstruct views of the hillsides (see Chapter 2, Project Description, Exhibit 2-7b); as such, no significant change to available views would occur. From Crosby Drive looking northwest, the proposed project would be clearly visible at the foot of the surrounding hills. The ridgeline would be preserved in its entirety, and no development would occur on slopes of 25 percent or greater, consistent with General Plan Program 20.3. As such, impacts to publicly accessible views in the area would be less than significant.

Regulation Consistency

The General Plan designates the majority of the portion of the project site proposed for development as low density residential. This designation allows for up to two dwelling units per acre. The project applicant is requesting an amendment to the General Plan to re-designate the lots that fall outside of the residential designation from OS-PH to low density residential. The project site would also be rezoned from unincorporated and Agricultural District (A) to Planned Unit Development–Low Density Residential/Open Space (PUD-LDR/ OS), and A.

As discussed above, the proposed project would avoid development on slopes of 25 percent or greater consistent with General Plan Program 20.3, and would preserve scenic hillsides and other hillside features surrounding the project site consistent with General Plan Program 20.2. The proposed project would be consistent with the land use and zoning designations with approval of the amendments discussed above, and would include permanent dedication of the majority of the project site as open space. By preserving a substantial amount of open space, the proposed project would meet General Plan requirements to protect scenic resources. As such, the proposed project's impacts related to applicable zoning and other regulations governing scenic quality would be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

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Exhibit 3.1-2
Visual Simulation - Crosby Drive

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Light and Glare

Impact AES-4: The proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Impact Analysis

Examples of light and glare include streetlights, freestanding lights, building-mounted lights, reflective building materials, and vehicular headlights. Currently, developed portions of the surrounding area contain numerous existing sources of light and glare, including streetlamps and exterior residential lights.

The proposed project would result in the development of a net 28 new homes with associated windows and exterior lighting, as well as accent lighting at the proposed entrance on Dublin Canyon Road. Additional vehicle traffic would also be associated with the proposed project. As such, the proposed project would create an increase of nighttime light and daytime glare, due to the increase of lighting, reflective surfaces, vehicle headlights in the area.

Construction

Construction-related impacts may include light and glare from construction equipment and machinery and nighttime security lighting. Light and glare during the construction phase would be temporary and limited to the duration of construction and would therefore not cause any substantial impacts to daytime or nighttime views in the area. Pursuant to the Municipal Code, construction activity shall only be permitted between the hours of 8:00 a.m. to 8:00 p.m. daily, except Sundays and holidays, when the exemption shall apply between 10:00 a.m. and 6:00 p.m. Compliance with Municipal Code Chapter 9.04 Section 9.04.100 regulations would limit the amount of nighttime construction lighting. Therefore, construction-related impacts associated with light and glare would be less than significant.

Operation

Potential sources of light associated with the proposed project would consist of lighting from the single-family homes and vehicles traveling to and from the project site. Lighting would be located throughout the project site. Exterior lighting would be located at the entrance on Dublin Canyon Road and within the project site. Lampposts would be evenly dispersed within the project site, with safety lighting as needed throughout the site. The proposed project would utilize 14-foot pole light standards along internal roadways. Although project nighttime lighting could adversely affect views on and near the project site, the site topography would help minimize such light from spilling off-site. Therefore, lighting impacts would be less than significant.

Potential sources of glare associated with the proposed project would consist of windows and other reflective building materials, and the reflective surfaces of vehicles parked and traveling within and around the project site. Because the site is mostly undeveloped currently, glare would substantially increase compared to existing conditions. As such, daytime glare impacts would be potentially significant.

However, the proposed project would be subject to the requirements set forth by the California Energy Code (CCR Title 24, Part 6). Compliance with the applicable lighting and energy requirements established by the California Energy Code would ensure that light and glare from the proposed project would not spillover onto adjacent land uses. Specifically, California Code of Regulations Section 132 of Title 24, Part 6 regulates lighting characteristics such as maximum power and brightness, shielding, and sensor controls to turn lighting on and off. These standards require automatically controlled outdoor lighting so that it turns off during daytime hours and other times when not needed.

Additionally, to further reduce impacts to less than significant, the proposed project would implement Mitigation Measure (MM) AES-4, which would require adhering to a design review process and the implementation of standards to minimize the proposed project's daytime glare contribution. Therefore, glare impacts would be less than significant with mitigation.

Level of Significance Before Mitigation

Potentially significant impact.

Mitigation Measures

MM AES-4a Adhere to Design Review Process and Standards

As part of the design review process for the proposed project, the applicant shall include the following features in its design review submittal:

- Structures facing a public street or neighboring property shall use minimally reflective glass, and other materials and colors used on the exterior of buildings and structures shall be selected with attention to minimizing reflective glare.
- Building windows shall be tinted with an anti-reflective material.

Level of Significance After Mitigation

Less than significant with mitigation incorporated.

3.1.7 - Cumulative Impacts

The geographic scope of the cumulative aesthetics analysis is the visual area surrounding the project site. The analysis also considers the foreseeable development projects listed in Table 3-1 (See Chapter 3, Environmental Impact Analysis) in the City that would be visible from the project site. As shown on Exhibit 3-1, there are no cumulative projects close enough to the project site to be visible in conjunction with the proposed project.

The General Plan EIR found that General Plan buildout would not result in a significant impact to the City's visual identity, scenic resources, or light and glare after compliance with General Plan policies and the Municipal Code. The General Plan defines areas that are considered scenic resources and

does not allow new development in areas that contribute significantly to a scenic vista or resource.[6] Therefore, there is no existing cumulative aesthetic impact.

Scenic Vistas

The cumulative project area is urban but contains large amounts of open space managed by EBRPD. The City considers open space and visible ridges and hillsides as scenic and includes policies within the General Plan to regulate development in these areas. All future developments including the proposed project and cumulative projects within Table 3-1 would be required to comply with these requirements. Therefore, cumulative impacts would be less than significant.

Scenic Highways

As described in Impact AES-2, I-680 runs north–south along the west side of the City, and is an officially Designated State Scenic Highway; I-580 is an Eligible State Scenic Highway. The General Plan also identifies these as scenic routes within the City. The project site is not visible from any City or State designated scenic route and would have no impact. Therefore, there would be no cumulative aesthetic impacts with respect to eligible scenic highways. Moreover, the proposed project would have no impact and, therefore, would not have any contribution to cumulative impacts.

Visual Character

As described in Impact AES-3, the project site is located adjacent to open space and residential land uses. Existing development in the surrounding area consists of detached single family residential communities interspersed by open space. Additionally, the proposed project would be consistent with the proposed PUD-LDR/OS and A zoning districts and would comply with applicable General Plan policies and programs related to the protection of the City's open space and hillsides. Therefore, the proposed project would not conflict with applicable zoning and other regulations governing scenic quality and would not result in a cumulative impact.

Additionally, cumulative projects listed in Table 3-1 would be required to adhere to all applicable regulations pertaining to visual character within the City. Therefore, there is no significant cumulative impact, and the proposed project's contribution would not be considerable. As such, the proposed project, in conjunction with other planned and approved projects, would result in a less than significant cumulative impact with respect to visual character.

Light and Glare

The proposed project and cumulative projects could increase light and glare in the geographic area. The proposed project and cumulative development would include streetlights, exterior lighting, safety lighting, lighting from vehicles, and sources of glare from buildings and vehicles. However, cumulative impacts would be less than significant because the majority of cumulative projects would be located in an already urbanized area and all cumulative projects would be subject to applicable regulations related to light and glare.

[6] City of Pleasanton. 2008. Proposed Pleasanton General Plan 2005-2025 Environmental Impact Report. September.

Additionally, cumulative development projects proposed would be required to adhere to the architectural, design, and lighting measures set forth by the California Energy Code (CCR Title 24, Part 6), as well as similar regulations outlined in the General Plan. Therefore, cumulative impacts would be less than significant. The proposed project's incremental contribution to light and glare would not be cumulatively considerable because it would not substantially contribute to the less than significant cumulative impact. The proposed project's exterior lighting would be consistent with neighboring developments and would maintain the existing character of the area. The proposed project's lighting would be shielded and directed downward to avoid trespassing to the adjacent residential properties and to avoid obtrusive light or glare in the public right-of-way. Exterior materials are designed to minimize glare and impact, without the use of any highly reflective exterior materials. As such, the proposed project, in conjunction with other planned and approved projects, would result in a less than significant cumulative impact with respect to light and glare.

Level of Cumulative Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

3.2 - Air Quality

3.2.1 - Introduction

This section describes existing air quality conditions regionally and locally as well as the relevant regulatory framework. This section also evaluates the possible impacts related to air quality that could result from implementation of the proposed project. Information included in this section is based, in part, on project-specific air quality modeling results utilizing California Emissions Estimator Model (CalEEMod) Version 2022.1. Complete modeling output is provided in Appendix B. There were no public comments related to air quality received during the scoping period.

3.2.2 - Environmental Setting

The Bay Area Air Quality Management District (BAAQMD) is the regional air quality agency for the San Francisco Bay Area Air Basin (SFBAAB). Air quality in this area is determined by such natural factors as meteorology, terrain, and temperature, in addition to the presence of existing air pollution sources and ambient conditions. These factors, along with applicable regulations aimed at reducing air pollution, are discussed below.

Air Pollutant Emissions

Although air pollution potential is strongly influenced by climate and topography, the air pollution that occurs in a location also depends on the amount of air pollutant emissions in the surrounding area or transported from more distance places. Air pollutant emissions generally are highest in areas that have high population densities, high motor vehicle use, and/or industrialization. These contaminants, created by photochemical processes in the atmosphere, such as ozone, may result in high concentrations many miles downwind from the sources of their precursor chemicals.

San Francisco Bay Area Air Basin

The project site is located within the San Francisco Bay Area Air Basin (SFBAAB). The SFBAAB consists of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, and Santa Clara counties; the southwestern portion of Solano County; and the southern portion of Sonoma County.

The Bay Area's diverse climate and topography influences air quality and pollution dispersion across the region. The region predominantly experiences a Mediterranean climate, characterized by mild, wet winters and dry, warm summers. The Bay Area is known for its microclimates, where weather conditions can vary significantly over short distances due to the region's complex topography, including hills, valleys, and proximity to the ocean. Areas closer to the coast, such as San Francisco and parts of San Mateo County, are influenced by the Pacific Ocean. Strong coastal winds which help disperse pollutants, leading to generally better air quality in coastal areas. Inland areas experience warmer temperatures and less fog. During certain weather conditions, temperature inversions can trap pollutants close to the ground, leading to higher concentrations of air pollution, particularly in inland valleys.

Overall, while the Bay Area generally enjoys good air quality, certain factors like vehicle emissions, industrial activities, and wildfires can lead to periods of poor air quality. Air quality varies across the

air basin locally due to differences in climate and topography in the various zones, as well as other factors such as the populations and sources of emissions.

Livermore Valley Climatological Subregion

The Livermore Valley is a sheltered inland valley near the eastern border of SFBAAB. The western side of the valley is bordered by 1,000 to 1,500 foothills with two gaps connecting the valley to the central SFBAAB, the Hayward Pass and Niles Canyon. The eastern side of the valley also is bordered by 1,000 to 1,500 foothills, with one major passage to the San Joaquin Valley called the Altamont Pass and several secondary passages. To the north lie the Black Hills and Mount Diablo. A northwest to southeast channel connects the Diablo Valley to the Livermore Valley. The south side of the Livermore Valley is bordered by mountains approximately 3,000 to 3,500 feet high.

During the summer months, when there is a strong inversion with a low ceiling, air movement is weak and pollutants become trapped and concentrated. Maximum summer temperatures in the Livermore Valley range, in degrees Fahrenheit (°F), from the high-80s to the low-90s, with extremes in the 100s. At other times in the summer, a strong Pacific high pressure cell from the west, coupled with hot inland temperatures causes a strong onshore pressure gradient which produces a strong, afternoon wind. With a weak temperature inversion, air moves over the hills with ease, dispersing pollutants.

In the winter, with the exception of an occasional storm moving through the area, air movement is often dictated by local conditions. At night and early morning, especially under clear, calm, and cold conditions, gravity drives cold air downward. The cold air drains off the hills and moves into the gaps and passes. On the eastern side of the valley the prevailing winds blow from north, northeast, and east out of the Altamont Pass. Winds are light during the late night and early morning hours. Winter daytime winds sometimes flow from the south through the Altamont Pass to the San Joaquin Valley. Average winter maximum temperatures range from the high-50s to the low-60s, while minimum temperatures are from the mid-to-high-30s, with extremes in the high teens and low-20s.

Air pollution potential is high in the Livermore Valley, especially for photochemical pollutants in the summer and fall. High temperatures increase the potential for ozone to build up. The valley not only traps locally generated pollutants but can be the receptor of ozone and ozone precursors from San Francisco, Alameda, Contra Costa and Santa Clara counties. On northeasterly wind flow days, most common in the early fall, ozone may be carried west from the San Joaquin Valley to the Livermore Valley.

During the winter, the sheltering effect of the valley, its distance from moderating water bodies, and the presence of a strong high pressure system contribute to the development of strong, surface-based temperature inversions. Pollutants such as carbon monoxide and particulate matter, generated by motor vehicles, fireplaces, and agricultural burning, can become concentrated. Air pollution problems could intensify because of population growth and increased commuting to and through the subregion.

Air Pollutant Types, Sources, and Effects

Concentrations of criteria air pollutants are used as indicators of air quality conditions. Air pollutants are termed criteria air pollutants if they are regulated by developing specific public health- and welfare-based criteria as the basis for setting permissible levels. According to the United States Environmental Protection Agency (EPA), criteria air pollutants are ozone, particulate matter (PM_{10} and $PM_{2.5}$), nitrogen dioxide (NO_2), carbon monoxide (CO), lead, and sulfur dioxide (SO_2). Table 3.2-1 provides a summary of the types, sources, and effects of criteria air pollutants.

In addition to criteria air pollutants, another group of pollutants commonly referred to as toxic air contaminants (TACs) or Hazardous Air Pollutants (HAPs), are pollutants that result in an increase in mortality or serious illness or pose a present or potential hazard to human health. Health effects of TACs may include cancer, birth defects, immune system damage, and neurological damage. In addition, many TACs can be toxic at very low concentrations. For some chemicals such as carcinogens, there are no thresholds below which exposure can be considered risk-free. The California Air Resources Board (ARB) identifies over 200 compounds as TACs (also termed as HAPs by the EPA). Table 3.2-1 provides a summary of the types, sources, and effects of TACs.

Other air quality issues of concern in the SFBAAB include nuisance impacts of odors and dust. Objectionable odors may be associated with a variety of pollutants. Common sources of odors include wastewater treatment plants, landfills, composting facilities, refineries, and chemical plants. Similarly, nuisance dust may be generated by a variety of sources, including quarries, agriculture, grading, construction, and roads. Odors rarely have direct health effects among the public. Each year the BAAQMD receives thousands of citizen complaints about objectionable odors. As shown in Table 3.2-1, dust emissions can contribute to increased ambient concentrations of PM_{10} and can also contribute to reduced visibility and soiling of exposed surfaces.

Table 3.2-1: Description of Criteria Pollutants of National and California Concern

Criteria Pollutant	Physical Description and Properties	Most Relevant Effects from Pollutant Exposure	Sources
Ozone	• A photochemical pollutant, i.e., it is not emitted directly into the atmosphere but is formed by a complex series of chemical reactions between volatile organic compounds (VOC), nitrous oxides (NO_X), and sunlight. • A regional pollutant that is generated over a large area and is transported and spread by the wind.	• Respiratory symptoms • Worsening of lung disease leading to premature death • Damage to lung tissue	• On-road and off-road mobile vehicle exhausts • Factories and industrial facilities • Consumer products
Particulate matter (PM_{10})	• A mixture of small particles that consist of dry solid fragments,	• Premature death and hospitalization, primarily	• Gasoline- and diesel-powered mobile vehicles

Criteria Pollutant	Physical Description and Properties	Most Relevant Effects from Pollutant Exposure	Sources
	droplets of water, or solid cores with liquid coatings. • Particulate matter that is between 2.5 and 10 microns in diameter (one micron is one-millionth of a meter).	for worsening of respiratory disease • Reduced visibility and material soiling	• Dust from construction sites, landfills, and agriculture • Combustion from oil • Burning wood and wildfires • Burning of brushes and wastes • Factories and industrial facilities
Particulate matter ($PM_{2.5}$)	• A mixture of small particles that consist of dry solid fragments, droplets of water, or solid cores with liquid coatings. • Particulate matter that is 2.5 microns or less in diameter, about one-thirtieth the size of the average human hair.	• Premature death • Hospitalization for worsening of cardiovascular disease • Hospitalization for respiratory disease • Asthma-related emergency room visits • Increased symptoms, increased inhaler usage	• Gasoline- and diesel-powered mobile vehicles • Combustion of oil and wood
Nitrogen dioxide (NO_2)	• A precursor to ozone, PM_{10}, and $PM_{2.5}$ formation. • Can react with compounds to form nitric acid and related small particles and result in particulate matter related health effects.	• Lung irritation • Intensified allergic responses	• Motor vehicle internal combustion engines • Fossil fuel-fired electric utility and industrial boilers
Carbon monoxide (CO)	• A colorless, odorless, toxic gas • Somewhat soluble in water.	• Chest pain in patients with heart disease • Headache • Light-headedness • Reduced mental alertness	• Motor vehicle internal combustion engines • Fossil fuel-fired electric utility and industrial boilers
Sulfur dioxide (SO_2)	• A colorless, pungent gas. • At levels greater than 0.5 parts per million (ppm), has a strong odor, similar to rotten eggs. Sulfur oxides (SO_X) include sulfur dioxide and sulfur trioxide. • Sulfuric acid is formed from sulfur dioxide, which can lead to acid deposition and can harm natural resources and materials.	• Worsening of asthma: increased symptoms, increased medication usage, and emergency room visits	• Combustion of sulfur-containing fuel from motor vehicles, locomotives, ships, and off-road diesel equipment • Industrial processes • Geothermal fields

Criteria Pollutant	Physical Description and Properties	Most Relevant Effects from Pollutant Exposure	Sources
	• A precursor to sulfate and PM_{10}.		
Lead (Pb)	• A solid heavy metal that can exist in air pollution as an aerosol particle component.	• Impaired mental functioning in children • Learning disabilities in children • Brain and kidney damage	• Lead smelters • Piston-engine aircraft operating on leaded aviation gasoline • Waste incinerators • Utilities • Lead-acid battery manufacturers • Dust from soils contaminated with lead-based paint
Hydrogen Sulfide	• A toxic air contaminant with flammable, colorless, poisonous gas that smells like rotten eggs.	• Nuisance odor (rotten egg smell) • At high concentrations: headache and breathing difficulties	• Manure • Storage tanks • Ponds • Anaerobic lagoons • Land application sites • Combustion of sulfur-containing fuels (oil and coal)
Sulfates	• Occur in combination with metal and/or hydrogen ions • Many sulfates are soluble in water.	• Hospitalization for respiratory disease • Asthma-related emergency room visits • Increased symptoms, increased inhaler usage	• Combustion of gasoline and diesel fuel
Visibility-reducing Particles	• A mixture of small particles that consist of dry solid fragments, droplets of water, or solid cores with liquid coatings. • The particles vary in shape, size, and composition. See the physical description and properties of PM_{10} and $PM_{2.5}$ above.	• Reduced airport safety, scenic enjoyment, and road safety	• Fuel or wood combustion for electrical utilities, residential space heating, and industrial processes • Construction and demolition • Metals, minerals, and petrochemicals • Wood products processing • Mills and elevators used in agriculture • Erosion from tilled lands • Waste disposal • Recycling • Vehicle exhaust • Road dust
Vinyl Chloride	• A chlorinated hydrocarbon and a colorless gas with a mild, sweet odor.	• Central nervous system effects, such as dizziness, drowsiness and headaches	• Vinyl chloride-containing plastics left to decompose in solid waste landfills,

Criteria Pollutant	Physical Description and Properties	Most Relevant Effects from Pollutant Exposure	Sources
	• Identified in 1990 as a toxic air contaminant and estimated a cancer unit risk factor.	• Long-term exposure: liver damage and liver cancer	sewage plants, and hazardous waste sites
Asbestos	• A number of naturally occurring fibrous silicate minerals that have been mined for their useful properties such as thermal insulation, chemical and thermal stability, and high tensile strength. The three most common types of asbestos are chrysotile, amosite, and crocidolite.	• Lung disease	• Attic and wall insulation • Vinyl floor tiles, sheet flooring and adhesives • Roofing and siding shingles • Textured walls and ceilings • Hot water and steam pipes with asbestos covering • Automobile clutches and brakes
Toxic Air Contaminant	• Sizes of particles vary from less than 2.5 micrometers to 10 micrometers • Particles can be spherical, irregular, or fibrous.	• Cancer • Reproductive and developmental effects • Neurological effects	• Cars and trucks (especially diesels) • Industrial sources, such as chrome platers • Neighborhood businesses, such as dry cleaners and service stations • Building materials and products
Sources: California Air Resources Board (ARB). 2023. Common Air Pollutants. Website: https://ww2.arb.ca.gov/resources/common-air-pollutants. Accessed April 1, 2025. United States Environmental Protection Agency (EPA). 2023. Learn About Asbestos. Website: https://www.epa.gov/asbestos/learn-about-asbestos#find. Accessed April 1, 2025. California Air Resources Board (ARB). 2023. ARB Identified Toxic Air Contaminants. https://ww2.arb.ca.gov/resources/documents/carb-identified-toxic-air-contaminants. Accessed April 1, 2025.			

Ozone

Ozone, a key element of smog, is formed in the atmosphere through complex chemical reactions between vehicles, industrial plants, consumer products and many other sources. Ozone can be compared to household bleach, which can kill living cells, such as germs or human cells, upon contact. It forms in greater quantities on hot, sunny, calm days. In metropolitan areas of California, ozone concentrations frequently exceed existing health-protective standards in the summer.[1]

[1] California Air Resources Board (ARB). 2023. Ozone & Health. Website: https://ww2.arb.ca.gov/resources/ozone-and-health. Accessed October 10, 2024.

Particulate Matter

Airborne particulate matter (PM) refers to a wide range of solid or liquid particles in the atmosphere, including solids and aerosols made up of tiny liquid droplets, dry solid fragments, and solid cores with liquid coatings. Respirable particulate matter with an aerodynamic diameter of 10 micrometers or less is referred to as PM_{10} while $PM_{2.5}$ includes a subgroup of finer particles that have an aerodynamic diameter of 2.5 micrometers or less. Some PM, such as pollen, is naturally occurring. PMs can either be directly emitted from sources (primary particles) or formed in the atmosphere through chemical reactions of gases (secondary particles) such as sulfur dioxide (SO_2), nitrogen oxides (NO_X), and certain organic compounds. These organic compounds can originate from natural sources, such as trees and vegetation, as well as human-made (anthropogenic) sources, including industrial activities and vehicle exhaust. [2]

Nitrogen Dioxide

NO_2 is a reddish-brown gas that is a by-product of combustion processes. Although automobiles and industrial operations are the main sources of NO_2, much of it in the ambient air is produced through atmospheric reactions between nitric oxide (NO) and other pollutants which require sunlight (photochemical reactions). Nitrogen dioxide contributes to the formation of several other pollutants, including ozone (O_3), nitric acid (HNO_3), and nitrate (NO_3^-) particles, which also form through photochemical reactions. The levels of NO_2 in the air fluctuate based on direct emissions and changing atmospheric conditions, especially the amount of sunlight. [3]

Carbon Monoxide

CO is an odorless, colorless gas. It is formed by the incomplete combustion of carbon-containing fuels, such as natural gas, gasoline, and wood from stationary and mobile sources. CO can also be formed through photochemical reactions in the atmosphere involving methane, non-methane hydrocarbons, other volatile organic compounds (VOCs), and organic molecules found in surface waters and soils. [4]

Sulfur Dioxide

SO_2 is a colorless acid gas with a pungent, irritating odor prevalent in ambient temperatures. It is formed the combustion of sulfur-containing fuel, such as from motor vehicles, locomotives, ships, and off-road diesel equipment. Additionally, SO_2 is emitted from some industrial processes such as natural gas and petroleum extraction, oil refining, and metal processing as well as during volcanic activity and geothermal fields. [5]

Lead

Lead is a relatively soft and chemically resistant metal present in many soils (especially urban soils) and which can get resuspended into the air. As a result of the phase-out of leaded gasoline, metal

[2] California Air Resources Board (ARB). 2023. Inhalable Particulate Matter & Health ($PM_{2.5}$ and PM_{10}). Website: https://ww2.arb.ca.gov/resources/inhalable-particulate-matter-and-health. Accessed October 10, 2024.

[3] California Air Resources Board (ARB). 2023. Nitrogen Dioxide & Health. Website: https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health. Accessed October 10, 2024.

[4] California Air Resources Board (ARB). 2023. Carbon Monoxide & Health. Website: https://ww2.arb.ca.gov/resources/carbon-monoxide-and-health. Accessed October 10, 2024.

[5] California Air Resources Board (ARB). 2023. Sulfur Dioxide & Health. Website: https://ww2.arb.ca.gov/resources/sulfur-dioxide-and-health. Accessed October 10, 2024.

processing is currently the primary source of lead emissions. The highest levels of lead in air are generally found near lead smelters. Other stationary sources are waste incinerators, utilities, and lead-acid battery manufacturers. [6]

Sulfates

Sulfates are chemicals containing sulfur in its fully oxidized form (SO_4^{2-}) combined with metal or hydrogen ions. In California, most sulfur emissions come from burning fuels like gasoline and diesel. When these fuels burn, a small amount of sulfate is released directly, but most sulfate in the air forms later. During combustion, sulfur in the fuel turns into SO_2, which then reacts in the atmosphere to become sulfate PM. This conversion happens quickly and thoroughly in California's urban areas due to local weather conditions, making sulfates a significant part of the PM in the air. [7]

Visibility-reducing Particles

PM pollution affects the environment by reducing visibility, creating haze. These particles come in various shapes, sizes, and chemical compositions, originating from windblown dust, soot, and the chemical transformation of gaseous pollutants (e.g., sulfates, nitrates, organic carbon particles). These fine particles, caused largely by combustion of fuel, can travel hundreds of miles causing visibility impairment. The most apparent symptom of PM pollution is visibility degradation due to the absorption and scattering of light by particles and gases in the atmosphere before it reaches the observer. Certain types of particles such as sulfates scatter more light, particularly during humid conditions.[8]

Asbestos

Asbestos is a TAC and a federal hazardous air pollutant of concern during construction and renovation. Asbestos is the common name for a group of naturally occurring fibrous minerals that can separate into thin, inhalable fibers. While there are many different types of asbestos; all forms of asbestos are harmful to human health. It has been known to cause lung cancer and mesothelioma, a cancer of the lining of lung tissue that is nearly always fatal. Since asbestos is naturally occurring in rock structures, it is a concern during construction and mining operations when it has the potential to be present.[9]

Toxic Air Contaminants (TACS)

Toxic air contaminants, also known as HAPs or air toxics, are pollutants that can cause serious health problems, including cancer, birth defects, and other severe health issues. These contaminants can be gases, like benzene and toluene, or compounds and metals such as asbestos, cadmium, mercury, and chromium. They come from various sources, including industrial processes, vehicle emissions, and chemical reactions in the atmosphere. The EPA identifies and regulates 188 toxic air pollutants.

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6 California Air Resources Board (ARB). 2023. Lead & Health. Website: https://ww2.arb.ca.gov/resources/lead-and-health. Accessed October 10, 2024.

7 California Air Resources Board (ARB). 2023. Sulfate & Health. Website: https://ww2.arb.ca.gov/resources/sulfate-and-health. Accessed October 10, 2024.

8 California Air Resources Board (ARB). 2023. Visibility-Reducing Particles & Health. https://ww2.arb.ca.gov/resources/visibility-reducing-particles-and-health. Accessed October 10, 2024.

9 United States Environmental Protection Agency (EPA). 2023. Learn About Asbestos. Website: https://www.epa.gov/asbestos/learn-about-asbestos#find. Accessed October 10, 2024.

These pollutants can have a wide range of health effects, such as respiratory issues, neurological damage, and reproductive problems. [10]

Concentrations of TACs are also used as indicators of air quality conditions. Air pollutant human exposure standards are identified for many TACs, including the following common TACs relevant to development projects: PM, fugitive dust, lead, and asbestos. These air pollutants are called TACs because they are air pollutants that may cause or contribute to an increase in mortality or in serious illness or that may pose a hazard to human health. TACs are usually present in minute quantities in the ambient air; however, their high toxicity or health impact may pose a threat to public health even at low concentrations. TACs can cause long-term health effects (such as cancer, birth defects, neurological damage, asthma, bronchitis, or genetic damage) or short-term acute affects (such as eye watering, respiratory irritation, runny nose, throat pain, or headaches).

TACs are separated into carcinogens and noncarcinogens based on the nature of the physiological effects associated with exposure to a particular TAC. Carcinogens are assumed to have no safe threshold below which health impacts would not occur. Cancer risk is typically expressed as excess cancer cases per million exposed individuals, typically over a lifetime exposure or other prolonged duration. For noncarcinogenic substances, there is generally assumed to be a safe level of exposure below which no negative health impact is believed to occur. These levels may vary depending on the specific pollutant. Acute and chronic exposure to noncarcinogens is expressed as a hazard index (HI), which is the ratio of expected exposure levels to an acceptable Reference Exposure Levels (RELs).

Regional Air Quality and San Francisco Bay Area Air Basin Attainment Status

The EPA and the ARB designate air basins where ambient air quality standards are exceeded as "nonattainment" areas. If standards are met, the area is designated as an "attainment" area. If there is inadequate or inconclusive data to make a definitive attainment designation, they are considered "unclassified." National nonattainment areas are further designated as marginal, moderate, serious, severe, or extreme as a function of deviation from standards.

The current attainment designations for the Air Basin are shown in Table 3.2-2. Currently in the Air Basin, 8-hour average ozone (both State and national), 1-hour average ozone (State), annual arithmetic mean PM_{10} (State), 24-hour average PM_{10} (State), annual arithmetic mean $PM_{2.5}$ (State), and 24-hour average $PM_{2.5}$ (national) are still in nonattainment status.

The current standards are summarized in Table 3.2-2.

[10] California Air Resources Board (ARB). 2023. ARB Identified Toxic Air Contaminants. https://ww2.arb.ca.gov/resources/documents/carb-identified-toxic-air-contaminants. Accessed October 10, 2024.

Table 3.2-2: Ambient Air Quality Standards

Air Pollutant	Averaging Time	California Standard[1] Concentration	National Standard Concentration	State Status	National Status
Ozone	8 Hour	0.070 ppm	0.070 ppm	Nonattainment	Nonattainment
	1 Hour	0.09 ppm	—		
CO (carbon monoxide)	8 Hour	9 ppm	9 ppm	Attainment	Attainment
	1 Hour	20 ppm	35 ppm		
NO_2 (nitrogen dioxide)	1 Hour	0.18 ppm	0.100 ppm	Attainment	Attainment
	Annual	0.030 ppm	0.053 ppm		
SO_2 (sulfur dioxide)	24 Hours	0.04 ppm	0.14 ppm	Attainment	Attainment
	1 Hour	0.25 ppm	0.075 ppm		
	Annual	—	0.030 ppm		
Particulate matter (PM_{10})	Annual Arithmetic Mean	20 µg/m^3	—	Nonattainment	Unclassified
	24 hours	50 µg/m^3	150 µg/m^3		
Particulate matter ($PM_{2.5}$)	Annual Arithmetic Mean	12 µg/m^3	9 µg/m^3	Nonattainment	Nonattainment
	24 Hours	—	35 µg/m^3		
Sulfates	24 Hours	25 µg/m^3	—	Attainment	N/A
Lead	Quarter	—	1.5 µg/m^3	Unclassified	N/A
	Rolling 3-month average	—	0.15 µg/m^3		
	30 days	1.5 µg/m^3	—		
Hydrogen sulfide	1 Hour	0.03 ppm	—	Unclassified	N/A
Vinyl chloride	24 Hours	0.01 ppm	—	N/A	Attainment

Notes:
ppm = parts per million
µg/m^3 = micrograms per cubic meter

Source: California Air Resources Board (ARB). 2024. Table of Ambient Air Quality Standards.
California Air Resources Board (ARB). 2024. Ambient Air Quality Standards Designation Tool.
United States Environmental Protection Agency (EPA). 2024. Nonattainment Areas for Criteria Pollutants (Green Book).

The current attainment designations for the Air Basin are shown in Table 3.2-3. Currently in the SFBAAB, 8-hour average ozone (both State and national), 1-hour average ozone (State), annual arithmetic mean PM_{10} (State), 24-hour average PM_{10} (State), annual arithmetic mean $PM_{2.5}$ (State), and 24-hour average $PM_{2.5}$ (national) are still in nonattainment status.

Table 3.2-3 summarizes the SFBAAB exceedances of the State and federal air quality standard over three years, from 2021 through 2023.

Table 3.2-3: San Francisco Bay Area Air Basin Exceedances 2021–2023

Exceedances of California and National Ambient Air Quality Standards for Past 3 Years			
	2021	2022	2023
Ozone			
Days over National 8-hour standard	9	5	4
Days over California 1-hour Standard	5	3	0
Days over California 8-hour Standard	9	6	4
Particulate Matter			
Days over National $PM_{2.5}$ Standard	2	3	3
Days over National 24-hour PM_{10} standard	0	0	0
Days over California 24-hour PM_{10} standard	0	0	0

Source:
Bay Area Air Quality Management District (BAAQMD). 2024. Protecting Our Climate and Communities: 2023 Annual Report.
BAAQMD. 2023. New Challenges: A New Path Forward. 2022 Annual Report.
BAAQMD. 2022. Our Purpose Is Clear: 2021 Annual Report.

Local Air Quality and Monitoring Data

The BAAQMD operates a regional air quality monitoring network that regularly measures the concentrations of the five major criteria air pollutants.[11] Air monitoring data is available in Appendix B. The local air quality can be evaluated by reviewing relevant air pollution concentrations near the proposed project area. The nearest ozone monitoring stations to the proposed project site is at the Livermore Monitoring Station located at 793 Rincon Avenue, Livermore, California.

Toxic Air Contaminants: Sources and Health Effects

TACs are air pollutants identified by the California Air Resources Board (ARB) and the BAAQMD as having the potential to cause serious health effects, including cancer and other severe illnesses. The BAAQMD monitors and regulates TACs to protect public health in the Bay Area, where diesel particulate matter (DPM) is a significant concern.[12,13] DPM, which constitutes about 85 percent of the cancer risk from TACs in the region, is primarily emitted from on-road diesel trucks, off-road internal combustion engines, and diesel construction equipment. Retail gas stations also pose

[11] California Air Resources Board (ARB). Air Quality Data Statistics. Website: https://www.arb.ca.gov/adam/. Accessed February 25, 2025.
[12] Bay Area Air Quality Management District (BAAQMD). 2014. Improving Air Quality & Health In Bay Area Communities: Community Air Risk Evaluation (CARE) Program Retrospective & Path Forward (2004–2013). April.
[13] California Air Resources Board (ARB). Summary: Diesel Particulate Matter Health Impacts. Website: https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts. Accessed October 17, 2024.

significant health risks due to emissions of benzene, a known carcinogen found in gasoline.[14] Benzene exposure can lead to serious health issues such as leukemia and other blood disorders.

DPM is highly toxic due to its fine particulate nature, allowing it to penetrate deep into the lungs and enter the bloodstream.[15] It is a significant component of $PM_{2.5}$, which is associated with various adverse health effects, including cardiovascular and respiratory diseases, and premature death.[16] DPM exposure has been linked to increased hospital admissions for heart disease and respiratory illnesses. The BAAQMD has established thresholds for $PM_{2.5}$ to protect public health, highlighting the importance of controlling DPM emissions.[17] Efforts to reduce these emissions include implementing stricter regulations and promoting cleaner technologies, such as the EPA's Tier 4 emission standards for off-road engines and the use of Ultra Low Sulfur Diesel Fuel, to protect communities, especially those near major transportation routes and industrial areas.[18]

Sensitive Receptors

Air pollution does not affect every individual in the population in the same way, and some groups are more sensitive to adverse health effects than others. Children and infants are among the most susceptible to air pollution due to their developing lungs, higher inhalation rates, narrow airways, and less mature immune systems. Children and adults with allergies may also have an enhanced allergic response when exposed to PM pollution. Other sensitive populations include the elderly, pregnant women (due to the developing fetus), and those with respiratory or cardiovascular illnesses affected by air pollution. Sensitive land uses (also referred to as receptors) are places where sensitive populations are most likely to spend their time. The groups identified with these land uses may have increased susceptibility to respiratory distress or, as in the case of residences, their exposure time is greater than that for other land uses.

BAAQMD defines sensitive receptors as people—children, adults, and seniors occupying or residing in:

- Residential dwellings, including apartments, houses, condominiums, single-room occupancy units, and residential hotels;
- Places of business;
- Schools, colleges and universities;
- Day care centers;
- Hospitals;
- Temporary housing, shelters, or encampments;

[14] California Air Resources Board (ARB). 2022. Gasoline Service Station Industrywide Risk Assessment Guidance. February 18.
[15] California Air Resources Board (ARB). Overview: Diesel Exhaust and Health. Website: https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health. Accessed February 25, 2025
[16] California Air Resources Board (ARB). Inhalable Particulate Matter and Health ($PM_{2.5}$ and PM_{10}). Website: https://ww2.arb.ca.gov/resources/inhalable-particulate-matter-and-health. Accessed February 25, 2025.
[17] Bay Area Air Quality Management District (BAAQMD). Air Quality Standards and Thresholds. Website: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa. Accessed February 25, 2025
[18] United States Environmental Protection Agency (EPA). Learn About Impacts of Diesel Exhaust and the Diesel Emissions Reduction Act (DERA). Website: https://www.epa.gov/dera/learn-about-impacts-diesel-exhaust-and-diesel-emissions-reduction-act-dera. Accessed February 25, 2025

- Detention centers or correctional facilities; and
- Senior-care facilities.[19]

Odors and Dust

Other air quality issues of concern in the SFBAAB include nuisance impacts of odors and dust. Objectionable odors may be associated with a variety of pollutants. Common sources of odors include wastewater treatment plants, landfills, composting facilities, refineries, and chemical plants. Similarly, nuisance dust may be generated by a variety of sources including quarries, agriculture, grading, construction, and roads. Odors rarely have direct health effects among the public. Each year the BAAQMD receives thousands of citizen complaints about objectionable odors. Dust emissions can contribute to increased ambient concentrations of PM_{10} and can also contribute to reduced visibility and soiling of exposed surfaces.

3.2.3 - Regulatory Framework

Air quality with respect to criteria air pollutants and TACs within the SFBAAB is regulated by such agencies as the BAAQMD, ARB, and EPA, along with local government agencies. Each of these agencies develops rules, regulations, policies, and/or goals to attain the goals or directives imposed through legislation. Although EPA regulations may not be superseded, both State and local regulations may be more stringent.

3.2.4 - Criteria Air Pollutants

Federal Regulations

The EPA is the governing body responsible for regulating air pollution in the United States and setting nationwide air quality and emissions standards. The EPA's air quality mandates are drawn primarily from the federal Clean Air Act (CAA), which was enacted in 1963 and amended in 1970, 1977, and 1990.

The CAA required the EPA to establish primary and secondary National Ambient Air Quality Standards (NAAQS).[20] The CAA also requires each state to prepare an air quality control plan referred to as a State Implementation Plan (SIP). The Clean Air Act Amendments of 1990 require states with nonattainment areas to revise their SIPs to incorporate additional control measures to reduce air pollution. The SIP is periodically modified to reflect the latest emissions inventories, planning documents, and rules and regulations of the air basins as reported by their jurisdictional agencies. The EPA has responsibility to review all state SIPs to determine conformation to the mandates of the CAA and determine if implementation will achieve air quality goals. If the EPA determines a SIP to be inadequate, a Federal Implementation Plan may be prepared for the nonattainment area that imposes additional control measures. Failure to submit an approvable SIP or to implement the plan

[19] Bay Area Air Quality Management District (BAAQMD). 2022. CEQA Guidelines Appendix E: Recommended Methods for Screening and Modeling Local Risks.

[20] United States Environmental Protection Agency (EPA). 2024. NAAQS Table. February. Website: https://www.epa.gov/criteria-air-pollutants/naaqs-table. Accessed February 25, 2025.

within the mandated timeframe may result in sanctions being applied to transportation funding and stationary air pollution sources in the air basin.

In addition, the EPA issues federal emissions standards for new motor vehicles and nonroad engines, national emissions standards for categories of new industrial equipment (e.g., power plants, industrial boilers, cement manufacturing, secondary lead smelting), and technical and policy guidance for SIPs. For instance, vehicle emissions standards issued by the EPA reduce tailpipe and evaporative emissions from passenger cars, light-duty trucks, medium-duty passenger vehicles, and some heavy-duty vehicles. In turn, these standards reduce atmospheric levels of ozone, fine particles, nitrogen dioxide, and toxic pollution.[21]

State Regulations

The ARB is the Statewide governing body which focuses on California's unique air quality challenges by setting the State's own, stricter, air pollutant emissions standards for a range of Statewide pollution sources including vehicles, fuels, on- and off-road equipment, and consumer products. The ARB implements the California Clean Air Act (CCAA) which was adopted in 1988 and developed to address air quality concerns not adequately addressed by the federal CAA. The CCAA requires that all air districts in the State endeavor to achieve and maintain the California Ambient Air Quality Standards (CAAQS) by the earliest practicable date. The CCAA specifies that air districts should focus particular attention on reducing the emissions from transportation and area-wide emission sources and provides air districts with authority to regulate indirect sources. The CAAQS set standards for 10 air pollutants: the six federal pollutants listed above as well as visibility-reducing particulates, hydrogen sulfide, sulfates, and vinyl chloride.

The ARB is responsible for Statewide pollution sources and produces a major part of the SIP, including addressing transport of pollutants. Local air districts are still relied upon to provide additional strategies for sources under their jurisdiction. The ARB combines this data and submits the completed SIP to the EPA. Other ARB duties include monitoring air quality (in conjunction with air monitoring networks maintained by air pollution control and air quality management districts) and updating area designations and maps.

The ARB is responsible for rulemaking to adopt and amend specific regulations to reduce emissions from mobile sources such as cars, trucks, buses, on- and off-road equipment, fuels, harbor craft, locomotives, ocean-going vessels at berth, and motorcycles, as well as consumer products and select stationary sources including gas stations.[22] These wide-ranging air quality regulations address all major sources of smog-forming air pollution (and other forms of air pollution). As a result, cars today are 99 percent cleaner than in the 1970s, resulting in less pollution overall, shorter hospital stays, and fewer days missed from school and work due to respiratory and cardiopulmonary diseases.[23]

[21] United States Environmental Protection Agency (EPA). 2024. May. Website: https://www.epa.gov/regulatory-information-topic/regulatory-and-guidance-information-topic-air. Accessed February 25, 2025.
[22] California Air Resources Board (ARB). Rulemaking Activity. Website: https://ww2.arb.ca.gov/rulemaking-activity. Accessed February 25, 2025.
[23] California Air Resources Board (ARB). 2024. June. Website: https://ww2.arb.ca.gov/about. Accessed February 25, 2025.

Regional Regulations

The BAAQMD is one of 35 local air pollution control districts created by the California legislature. It has the authority to regulate air pollutant emissions from businesses and stationary facilities, ranging from oil refineries to auto body shops and dry cleaners. BAAQMD is the primary agency responsible for ensuring that the national and California Ambient Air Quality Standards (CAAQS) are attained and maintained in the SFBAAB.

The BAAQMD develops and enforces regulations to control air pollution from various sources, including industrial facilities, motor vehicles, and consumer products. These regulations are designed to meet the air quality standards set forth in the SIP and to protect public health and the environment.

Local Regulations

City of Pleasanton 2005 – 2025 General Plan

Goals, Policies and Programs for Air Quality (including Toxic Air Contaminants) and Greenhouse Gases

Goal 1 Implement a proactive approach and use available technology to maintain and improve air quality within Pleasanton and the region to protect the public health, safety, and welfare.

Goal 2 Promote sustainable development and planning to minimize additional air emissions.

Policy 1 Adhere to federal and State air quality standards for local pollutants of concern.

Program 1.1 Incorporate measures in conditions of approval for development projects to reduce grading, construction, and operations-related air quality impacts.

Program 1.2 Support State and federal legislation that promotes improvements in air quality. Also implement programs from the Hazardous Materials section of the Public Safety Element.

Policy 2 Support development plans that reduce mobile source emissions by reducing vehicle trips and vehicle miles traveled.

Implement programs from the Land Use Element to provide mixed-use developments, locate high-density uses near transit facilities, and provide neighborhood-serving retail uses convenient to residential neighborhoods. These programs would reduce vehicle trips and vehicle miles traveled, thus reducing air pollutant emissions.

Policy 3 Separate air pollution sensitive land uses from sources of air pollution. Locate new air pollution point sources, such as manufacturing and extracting facilities, away from residential areas and other sensitive land uses following the California Air Resource Board's recommendations.

Program 3.2 Locate new sensitive receptors, such as residences (including residential care and assisted living facilities for the elderly), child care centers, schools, playgrounds, and medical facilities away from point sources of air pollution and busy traffic corridors following the California Air Resource Board's recommendations. Require site specific studies of air quality health risk for development that would place sensitive receptors closer than 500 feet from the edge of a freeway or close to a significant point source of air pollution.

Policy 4 Reduce air pollution from motor vehicle trips and Vehicle Miles Traveled.

Program 4.1 Develop standards for the design and use of new drive-through businesses to minimize adverse impacts on air quality. Public education and the use of new technologies should be considered as part of this program.

To reduce vehicle miles traveled with commensurate reductions in air pollution and climate change, implement Transportation Demand Management (TDM) programs from the Circulation Element, including the addition of local and regional bicycle lanes. Also implement Circulation Element measures to facilitate the free flow of vehicular traffic, including continually updating computer-control technology for traffic lights. In order to shorten the distance of worker commutes, also implement programs from the Housing Element to provide mixed-use development and to provide housing opportunities for Pleasanton workers of all socioeconomic levels.

Policy 5 Review proposed projects for their potential to impact air quality conditions.

Program 5.1 Include air quality as a factor in the City's environmental review process. Encourage development plans which minimize negative impacts on air quality.

Program 5.2 Require projects which generate high levels of air pollutants, such as manufacturing facilities and hazardous waste handling operations, to incorporate air quality mitigations in their design.

Program 5.3 Adopt an ordinance regulating burning indoors and outdoors, including fireplaces, wood-burning stoves, and fire pits. The ordinance may consider allowable hours and setbacks from neighbors.

Policy 6 Reduce air pollution and the production of greenhouse gases by increasing energy efficiency, conservation, and the use of renewable resources.

Program 6.1 Develop a Greenhouse Gas (GHG) Emissions Reduction Plan and/or Climate Action Plan for the City to control and reduce net GHG emissions and the effects of climate change. Development of this plan(s) shall include the following steps: (1) conduct a baseline analysis (GHG emissions inventory): (2) adopt an emissions reduction target; (3) develop strategies and actions for reducing emissions; (4) develop strategies and actions for adapting to climate change; (5) implement strategies and

actions; and (6) monitor emissions and verify results a minimum of every five years starting in 2015.

Program 6.2 Adopt standard methodology for estimating greenhouse gas emissions from development projects and utilize this methodology as part of the project review process.

Program 6.3 For development approved prior to adoption of a Climate Action Plan, require the following Best Management practices: BMP #1: Single- and multi-family residential and commercial development to comply with the City of Pleasanton's Green Building Ordinance. As far as feasible, residential projects should incorporate: resource efficient landscaping, energy-efficient hot water distribution systems; high efficiency toilets and other low flow plumbing fixtures; high efficiency heating and cooling systems; pre-plumbing for solar water heating; installation of wiring conduit for future photovoltaic systems; installation of Energy Star appliances; and Green Points in the Community Design and Planning category. BMP#2: Development shall incorporate energy-efficient appliances and systems that meet Energy Star standards. BMP#3: Where feasible, incorporate solar roofs (or other alternative energy measures) into commercial development sufficient to meet 12.5 percent of the building's annual energy usage. Calculations of energy savings may be prepared at the construction drawing stage. Where feasible, residential development to be solar-ready, including proper solar orientation, electrical conduit installed for solar electric system wiring, plumbing installed for solar hot water system, and space provided for solar hot water storage tank. BMP#4: Require transit and bicycle/pedestrian connections in new development, where feasible. For the purposes of Program 6.2, development is defined as all multi-family residential development with more than eight units, single-family homes with more than 2,000 square feet, commercial development with more than 20,000 square feet, and public projects. BMP#5: For commercial/industrial projects, prepare and implement a voluntary Trip Reduction Plan, using the resources available through the City of Pleasanton's Transportation Systems Management program as described in Chapter 17.24 of the Pleasanton Municipal Code. Trip reduction goal of 15 percent within five years and 25 percent within 10 years, compared to "business as usual." BMP# 6: Require priority facilities for alternative-fueled vehicles, such as priority parking and recharging facilities, where feasible. BMP# 7: Development and demolition to comply with the City's Construction and Demolition Debris Ordinance (ordinance currently in draft form). BMP# 8: In new commercial and multi-family projects, include facilities to accommodate recycling consistent with the City's programs. BMP# 9: Incorporate "heat island" treatments that include cool roofs, cool pavements, and/or strategically placed shade trees. Implement programs from the Energy Element including those related to green building, such encouraging passive solar construction, as well as those related to reducing energy from appliances, equipment, and lighting. Implement programs from the Public Facilities and Community Programs Element to reduce solid waste. Also implement the program in

the Water Element to conserve Pleasanton's urban forest as well as programs in the Community Character Element to replace and protect street trees. Tree shade not only helps lower energy use during hot months, but most tree species also remove air pollutants from the environment.

Policy 7 Provide leadership to Pleasanton residents and businesses by implementing all technology-based air pollutant reduction programs that are reasonable and feasible.

Program 7.1 Adopt a City "Green Fleet" policy to guide the City in purchasing energy-efficient and clean vehicles.

Program 7.2 Continue to properly maintain the City vehicle fleet to ensure as-designed vehicle operation. Proper preventive maintenance includes regular tune-ups, filter replacements, and engine diagnosis.

Program 7.3 As resources allow, continue and increase police bicycle patrols.

Program 7.4 As the City replaces landscaping equipment, gas cans, street sweepers, and other electrical and mechanical equipment, consider purchasing the least polluting equipment available.

Program 7.5 Postpone activities that contribute to air emissions on Spare the Air Days. Activities include: use of fossil fuel-powered landscaping equipment; surface coating and paint projects; and refueling vehicles. Reschedule vehicle trips, if feasible, without impacting project deadlines.

Program 7.6 Adopt a measure requiring large vehicles (gross weight rating of greater than 14,000 pounds) and off-road equipment owned by the City and/or private contractors to restrict engine idling to less than 5 consecutive minutes and to prohibit engine idling in parking lots, where feasible.

Policy 8 Minimize unpleasant odors in residential neighborhoods.

Program 8.1 Continue efforts to have the asphalt plant relocated away from Vineyard Avenue residents.

Program 8.2 Continue working with the Dublin-San Ramon Services District (DSRSD) to ensure that odors from the sewage-treatment plant are minimized and other air emissions meet all regulatory requirements.

Policy 9 Strongly encourage citizen and business participation in reducing air pollution.

Policy 9.1 Provide regional and local air quality information on the City of Pleasanton's website, including links to the Bay Area Air Quality Management District, the California Air Resources Board, Alameda County Waste Management Authority Stop Waste.org, and other environmental-based internet sites.

Policy 9.2 Establish an air quality public awareness program which includes changes that people can make to minimize air pollution. This program would educate the public and encourage people to choose the cleanest paints and consumer products, and to purchase the most energy-efficient appliances, landscaping equipment, and gas cans. This program would further encourage the public to purchase more energy-efficient vehicles and to properly maintain them.

Program 9.3 Develop incentives for the public to help reduce air pollution. This includes offering incentive programs for using non-motorized (i.e., pedestrian and bicycle) and low-polluting mobility alternatives.

Program 9.4 Develop a recognition and awards program for businesses that reduce air pollution.

Program 9.5 Provide information to the public regarding the importance of Spare the Air Days and how people can make a positive impact on the environment.

Program 9.6 When the School District replaces landscaping, cleaning, and other fuel-powered equipment, strongly encourage the District to purchase the least polluting equipment available that is feasible. Implement measures from the Circulation Element to encourage public participation in Ride-Share and other public transportation programs.

City of Pleasanton, Housing Element Update FEIR

Implementing Measures

MM AIR-1a Prior to the issuance of a grading or building permit, whichever is sooner, the project applicant for a potential site for rezoning shall submit an air quality construction plan detailing the proposed air quality construction measures related to the project such as construction phasing, construction equipment, and dust control measures, and such plan shall be approved by the Director of Community Development or designee. Air quality construction measures shall include (1) Basic Construction Mitigation Measures, as approved by the Bay Area Air Quality Management District (BAAQMD) in 2017, or the then currently adopted guidelines, and, (2) where construction-related emissions would exceed the applicable thresholds as demonstrated by a qualified consultant conducted pursuant to methodologies considered acceptable at that time, Additional Construction Mitigation Measures, as recommended by the BAAQMD, shall be implemented to reduce emissions to acceptable levels. The air quality construction plan shall be included on all grading, utility, building, landscaping, and improvement plans during all phases of construction and for access roads, parking areas, and staging areas at construction sites.

3.2.5 - Toxic Air Contaminants

TACs can be separated into carcinogens and noncarcinogens based on the nature of the physiological degradation associated with exposure to the pollutant. For regulatory purposes, carcinogens are

assumed to have no safe threshold below which health impacts will not occur. Noncarcinogenic TACs differ in that there is a safe level in which it is generally assumed that no negative health impacts would occur. These levels are determined on a pollutant-by-pollutant basis.

It is important to understand that TACs are not considered criteria air pollutants and thus are not specifically addressed through the setting of ambient air quality standards. Instead, the EPA and ARB regulate TACs (known by the EPA as HAPs) through statutes and regulations that generally require the use of Maximum Available Control Technology (MACT) or Best Available Control Technology (BACT) to limit emissions. Those, in conjunction with additional rules set forth by the BAAQMD, establish the regulatory framework for TACs.

Federal Regulations

The CAA requires the EPA to regulate toxic air pollutants, also known as air toxics, from large industrial facilities in two phases. The first phase is "technology-based," where EPA develops standards for controlling the emissions of TACs from sources in an industry group (or "source category.") These MACT standards are based on emissions levels that are already being achieved by the controlled and low-emitting sources in an industry. The second phase is a "risk-based" approach called residual risk. Here, EPA must determine whether more health-protective standards are necessary. Within 8 years of setting the MACT standards, the CAA requires EPA to assess the remaining health risks from each source category to determine whether the MACT standards protect public health with an ample margin of safety and protect against adverse environmental effects.

Every 8 years after setting the MACT standards, the CAA also requires EPA to review and revise the standards, if necessary, to account for improvements in air pollution controls and/or prevention. The first 8-year review, when combined with the residual risk review, is called the risk and technology review.

State Regulations

California has a comprehensive and effective air toxics program. Several pieces of legislation form the basis for ARB to identify and control air toxics from a multitude of sources, inform the public of significant toxic exposures, and provide ways to reduce risks from these exposures. The key programs outlined by legislative mandates include the Toxic Air Contaminant Identification and Control Program (Assembly Bill [AB] 1807), the Air Toxics Hot Spots Information and Assessment Act (AB 2588), the Children's Environmental Health Protection Act, and the Community Air Protection Program. The ARB has identified more than 200 toxic air pollutants and has adopted and implemented 25 ATCMs. Some of the air toxics that have been identified and controlled include: benzene in gasoline, hexavalent chromium from chrome platers, perchloroethylene from dry cleaners, and diesel exhaust from cars and trucks. The Community Air Protection Program (AB 617) was signed into law to reduce exposure in communities experiencing high cumulative exposure to air pollution including air toxic chemicals, many of which occur in disadvantaged communities.[24]

[24] California Air Resources Board (ARB). 2024. Website: https://ww2.arb.ca.gov/our-work/programs/air-toxics-program. Accessed February 25, 2025.

ARB has adopted diesel exhaust control measures and more stringent emission standards for various on-road mobile sources including transit buses and off-road diesel equipment (e.g., tractors, generators). These standards are encompassed in the Airborne Toxic Control Measures (ATCMs) aimed at reducing TACs from mobile sources (including on-road and off-road vehicles) and stationary sources. ATCMs that are relevant and applicable to the proposed project are listed below:[25]

- Diesel PM Control Measure for On-Road Heavy-Duty Diesel-Fueled Residential and Commercial Solid Waste Collection Vehicles (13 California Code of Regulations [CCR] §§ 2020, 2021)
- ATCM for Diesel PM from Portable Engines Rated at 50 Horsepower and Greater (17 CCR § 93116)
- ATCM to Limit Diesel-Fueled Commercial Motor Vehicle Idling (13 CCR § 2485)
- Asbestos ATCM for Construction, Grading, Quarrying and Surfacing Mining Operations; (17 CCR § 93105)
- ATCM to Reduce Particulate Emissions from Diesel-Fueled Engines – Standards for Nonvehicular Diesel Fuel (17 CCR § 93114)

As a result of these actions, mobile source emissions of TACs (benzene, 1,3-butadiene, DPM) and stationary sources of TACs have been reduced significantly since 1990, leading to a reduction of ambient cancer risk in California of about 80–85 percent.

Regional Air Quality Regulations for TACs

The BAAQMD has regulated TACs since the 1980s. At the local level, air pollution control or management districts may adopt and enforce ARB's control measures. Under BAAQMD Regulation 2-1 (General Permit Requirements), Regulation 2-2 (New Source Review), and Regulation 2-5 (New Source Review), all nonexempt sources that possess the potential to emit TACs are required to obtain permits from BAAQMD. Permits may be granted to these operations if they are constructed and operated in accordance with applicable regulations, including new source review standards and air toxic control measures. The BAAQMD limits emissions and public exposure to TACs through a number of programs. The BAAQMD prioritizes TAC-emitting stationary sources based on the quantity and toxicity of the TAC emissions and the proximity of the facilities to sensitive receptors. In addition, the BAAQMD has adopted Regulation 11, Rules 2 and 14, which address asbestos demolition, renovation, manufacturing, and standards for asbestos-containing serpentine.

The BAAQMD adopted Regulation 11, Rule 18 (Reduction of Risk from Air Toxic Emissions at Existing Facilities) in 2017, which requires any facility with health risks above risk action thresholds to make reasonable reductions in those health risks.

AB 617 required all air districts around the State to identify and select communities that suffer a high cumulative exposure burden from air pollution. In the Bay Area, these communities include all the Community Air Risk Evaluation (CARE) Areas, as well as areas with large sources of air pollution,

[25] California Air Resources Board (ARB). 2024. Airborne Toxic control Measures. Website: https://ww2.arb.ca.gov/resources/documents/airborne-toxic-control-measures. Accessed February 25, 2025.

areas that have been identified via Statewide screening tools as having pollution and/or health burden vulnerability, and areas that have low life expectancy. The proposed project is not located within a CARE or AB 617-identified community.

The proposed project is not located within a Community Air Risk Evaluation (CARE) or AB 617-identified community.

3.2.6 - Thresholds of Significance

The Lead Agency utilizes the criteria in the California Environmental Quality Act (CEQA) Guidelines Appendix G Environmental Checklist to establish thresholds of significance to determine whether impacts to air quality are significant environmental effects. As such, the City has determined that the proposed project would have a potential impact if it would:

a) Conflict with or obstruct implementation of the applicable air quality plan.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard.

c) Expose sensitive receptors to substantial pollutant concentrations.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Consistency with Air Quality Management Plan

Impact AIR-1:	**The proposed project could conflict with or obstruct implementation of the applicable air quality plan.**

Impact Analysis

The BAAQMD has adopted several air quality policies and plans to address regional air quality standards, the most recent of which is the 2017 Clean Air Plan. The 2017 Clean Air Plan was adopted in April of 2017 and serves as the regional Air Quality Plan (AQP) for the Air Basin for attaining NAAQS. The primary goals of the 2017 Clean Air Plan are to protect public health and protect the climate. The 2017 Clean Air Plan acknowledges that the BAAQMD's two stated goals of protection are closely related. As such, the 2017 Clean Air Plan identifies a wide range of control measures intended to decrease both criteria pollutants and GHG. The 2017 Clean Air Plan also accounts for projections of population growth provided by the Association of Bay Area Governments (ABAG) and Vehicle Miles Traveled (VMT) provided by the Metropolitan Transportation Commission (MTC) and identifies strategies to bring regional emissions into compliance with federal and State air quality standards. A project would be judged to conflict with or obstruct implementation of the 2017 Clean Air Plan if it would result in substantial new regional emissions not foreseen in the air quality planning process.

The BAAQMD does not provide a numerical threshold of significance for project-level consistency analysis with AQPs. Therefore, the following criteria will be used for determining a project's consistency with the AQP.

- **Criterion 1:** Does the project support the primary goals of the AQP?
- **Criterion 2:** Does the project include applicable control measures from the AQP?
- **Criterion 3:** Does the project disrupt or hinder the implementation of any AQP control measures?

Criterion 1

The primary goals of the 2017 Clean Air Plan, the current AQP to date, are to:

- Attain air quality standards;
- Reduce population exposure to unhealthy air and protect public health in the Bay Area; and
- Reduce GHG emissions and protect the climate.

A measure for determining whether the proposed project supports the primary goals of the AQP is if the project would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQPs. This measure is determined by comparing project emissions to the significance thresholds identified by the BAAQMD for construction- and operation-related pollutants. These quantitative significance thresholds are applied in the evaluation of Impact AIR-2, below. As discussed under Impact AIR-2 and Impact AIR-3, the proposed project would not significantly contribute to cumulative nonattainment pollutant violations or expose sensitive receptors to substantial pollutant concentrations. To demonstrate less than significant impacts related to fugitive dust, control measures would be required to be implemented during the construction of the proposed project to reduce localized dust impacts. Impacts related to fugitive dust from the proposed project's construction would be potentially significant without the inclusion of sufficient dust control measures. Implementing Measure (IM) AIR-1, which is required by the General Plan to demonstrate consistency with the City's Housing Element, would require the inclusion of construction-related air quality measures to reduce potential impacts related to fugitive dust emissions from use of construction equipment. With implementation of IM AIR-1, the proposed project would be consistent with Criterion 1.

Criterion 2

Another measure for determining whether a project is consistent with the AQP is to determine whether the project is inconsistent with the growth assumptions incorporated into the AQP and, thus, whether it would interfere with the region's ability to comply with federal and California air quality standards. The BAAQMD completes the regional emissions inventory for the SFBAAB. In part, the regional population, housing, and employment projections developed by ABAG are based on cities and counties general plan land use designations. These projections form the foundation for the emissions inventory of the 2017 Clean Air Plan. These demographic trends are incorporated into Plan Bay Area, compiled by ABAG and the MTC, to determine priority transportation projects and VMT in the Bay Area. Projects consistent with the local general plan are considered consistent with the regional AQP. Large projects that exceed regional employment, population, and housing planning projections have the potential to be inconsistent with the regional inventory compiled as part of the 2017 Clean Air Plan.

The proposed project, currently located in unincorporated Alameda County, would build 28 single-family homes and six Accessory Dwelling Units (ADU) (six of the homes would include attached ADUs). As described in the Project Description, the proposed project includes annexation into the City of Pleasanton, along with a General Plan Amendment of Public Health/Safety (PH) Overlay to LDR, a Planned Unit Development (PUD) rezoning. The proposed project site would be rezoned from unincorporated to Planned Unit Development-Low Density Residential (PUD-LDR). The project site was evaluated as PUD-LDR in the City's 2023-2031 Housing Element Update.

The proposed project, once rezoned, will therefore be consistent with the underlying general plan land use designation and was considered in the City's most recently adopted Housing Element. Thus, the proposed project would not have the potential to substantially affect housing, employment, and population projections in the region that are the basis of the 2017 Clean Air Plan projections.

Criterion 3

The AQPs also assume adherence to all mandatory regulations to reduce air pollution. Therefore, to conform to the assumptions in the AQP, a project must be consistent with all applicable measures contained in the applicable AQP. The Clean Air Plan contains 85 control measures to reduce air pollutants and GHGs at the local, regional, and global levels. Along with the traditional stationary, area, mobile source, and transportation control measures, the Clean Air Plan contains several control measures designed to protect the climate and to promote mixed-use and compact development to reduce vehicle emissions and exposure to pollutants from stationary and mobile sources. The Clean Air Plan also includes an account of the implementation status of control measures identified in the 2010 Clean Air Plan.

To establish compliance with the Clean Air Plan, the proposed project would be required to comply with applicable Clean Air Plan control measures, listed below:

- BL1: Green Buildings;
- BL4: Urban Heat Island Migration;
- EN1: Decarbonize Electricity Generation;
- EN2: Decrease Electricity Demand;
- NW2: Urban Tree Planting;
- WA3: Green Waste Diversion;
- WA4: Recycling and Waste Reduction;
- SS36: Particulate Matter from Trackout;
- SS37: Particulate Matter from Asphalt Operations; and
- TR9: Bicycle and Pedestrian Access and Facilities.

The proposed project would comply with the above control measures as specified below:

- For consistency with Clean Air Plan Measures BL1, EN1, and EN2, the proposed project would comply with the latest energy efficiency standards, such as the 2022 California Title 24 Energy Code, including Title 24, Part 6, Subchapter 8, which would require the proposed project to incorporate rooftop solar. In addition, the proposed project would incorporate applicable energy efficiency features designed to reduce project energy consumption.

- For consistency with Clean Air Plan Measures BL4 and NW2, the proposed project would also incorporate native and native-type species that are drought-tolerant and wind resistant to conserve water use. According to applicant-provided site plans, ample tree planting will occur within the residential lots. In addition, the proposed project would conserve 69.30 acres of open space to be dedicated to the East Bay Regional Park District for preservation in perpetuity.
- For consistency with Clean Air Plan Measures WA3 and WA4, the proposed project would utilize a waste service provider compliant with AB 341, SB 939, and SB 1374 requirements.
- For consistency with Clean Air Plan Measure SS36, the proposed project would comply with fugitive dust emissions minimization requirements established in Municipal Code Section 20-30.090, Performance Standards for All Development and Land Uses. In addition, IMAIR-1 would require the proposed project to incorporate BAAQMD's Basic Construction Mitigation Measures.
- For consistency with Clean Air Plan Measure SS37, the proposed project would utilize asphalts subject to BAAQMD Regulation 8, Rule 15-Emulsified and Liquid Asphalts. The use of asphalts under this regulation would limit the reactive organic gas (ROG) content in the asphalt.
- For consistency with Clean Air Plan Measure TR9, the proposed project would include the striping of a 6-foot-wide bicycle lane on both sides of Dublin Canyon Road along the project frontage and the construction of these bike lanes with the widening of Devany Creek bridge. In addition, the project proposes the construction of sidewalks along Street A, Street B, and Court C. The project also proposes the construction of a 5-foot-wide sidewalk along the front of Lot 30 along Dublin Canyon Road along with a pedestrian crossing at Canyon Meadows that would facilitate access to the proposed East Bay Regional Park District trailhead. Crosswalks are also proposed to be constructed within the project site to facilitate pedestrian access sitewide.

In summary, the proposed project would not conflict with any applicable measures under the 2017 Clean Air Plan after implementing IM AIR-1; therefore, the proposed project would be consistent with Criterion 3.

Summary

As addressed above, the proposed project would not conflict with the 2017 Clean Air Plan and meets all three criteria set forth by BAAQMD for demonstrating consistency. Therefore, impacts associated with conflicting with or obstructing the 2017 Clean Air Plan's implementation would be less than significant.

Implementing Measures

IM AIR-1 The following measures shall be implemented during all phases of construction to control dust and exhaust at the project site:

- Water active construction areas at least twice daily or as often as needed to control dust emissions.

- Cover trucks hauling soil, sand, and other loose materials and/or ensure that all trucks hauling such materials maintain at least two feet of freeboard.
- Remove visible mud or dirt trackout onto adjacent public roads using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- Enclose, cover, water twice daily or apply non-toxic soil binders to exposed stockpiles (dirt, sand, etc.).
- Pave new or improved roadways, driveways, and sidewalks as soon as possible.
- Lay building pads as soon as possible after grading unless seeding or soil binders are used.
- Limit all vehicle speeds on unpaved roads to 15 mph.
- Replant vegetation in disturbed areas as quickly as possible.
- Install sandbags or other erosion control measures to prevent silt runoff to public roadways.
- Minimize idling times either by shutting off equipment when not in use or reducing the maximum idling time to 5 minutes (as required by the California Airborne Toxic Control Measure (ATCM) Title 13, Section 2485 of California Code of Regulations). Provide clear signage for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.
- Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

Impact AIR-2:	**The proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard.**

Impact Analysis

This impact is related to the cumulative effect of a project's regional criteria pollutant emissions. By its nature, air pollution is largely a cumulative impact resulting from emissions generated over a large geographic region. The nonattainment status of regional pollutants results from past and present development within the SFBAAB, and this regional impact is a cumulative impact. Therefore, new development projects (such as the proposed project) within the SFBAAB would contribute to this impact only on a cumulative basis. No single project would be sufficient in size, by itself, to result in nonattainment of regional air quality standards. Instead, a project's emissions may be individually limited but cumulatively considerable when evaluated in combination with past, present, and future development projects.

Potential localized and regional impacts would result in exceedances of State or federal standards for NO_X, ROG, particulate matter (PM_{10} and $PM_{2.5}$), or CO. NO_X emissions are of concern because of potential health impacts from exposure to NO_X and ROG emissions during both construction and operation and as a precursor in the formation of airborne ozone. PM_{10} and $PM_{2.5}$ are of concern during construction because of the potential to emit exhaust emissions from the operation of off-road construction equipment and fugitive dust during earth-disturbing activities (construction fugitive dust). CO emissions are of concern during project operation because operational CO hotspots are related to increases in on-road vehicle congestion and potential health effects.

The cumulative analysis focuses on whether a specific project would result in cumulatively considerable emissions. According to Section 15064(h)(4) of the CEQA Guidelines, the existence of significant cumulative impacts caused by other projects alone does not constitute substantial evidence that the proposed project's incremental effects would be cumulatively considerable. Rather, the determination of cumulative air quality impacts for construction and operational emissions is based on whether the proposed project would result in regional emissions that exceed the BAAQMD regional thresholds of significance for construction and operations on a project level. The significance thresholds represent the allowable quantity of emissions each project can generate without producing a cumulatively considerable contribution to regional air quality impacts. Therefore, a project that would not exceed the BAAQMD thresholds of significance on the project level also would not be considered to result in a cumulatively considerable contribution to these regional air quality impacts. Construction and operational emissions are discussed separately below.

Construction

During construction, fugitive dust would be generated from demolition, site grading, and other earthmoving activities. The majority of fugitive dust would remain localized and deposited near the project site; however, potential fugitive dust impacts exist unless control measures are implemented to reduce this source's emissions. Exhaust emissions would also be generated from the operation of the off-road construction equipment and on-road construction vehicles.

Construction Fugitive Dust

For a project to have a less than significant criteria air pollutant impact related to construction-related fugitive dust emissions, it must implement all of the BAAQMD basic BMPs listed in the Guidelines.[26] MM AIR- would require that the proposed project include all construction BMPs as part of compliance with standard construction permits. Therefore, impacts related to fugitive dust would be less than significant.

Construction Emissions: ROG, NO_X, PM_{10}, and $PM_{2.5}$

Construction emissions were quantified and estimated using CalEEMod Version 2022.1 for a typical construction scenario for a land use project of this size. Estimated construction emissions are compared with the applicable thresholds of significance established by the BAAQMD to assess ROG, NO_X, exhaust PM_{10}, and exhaust $PM_{2.5}$ construction emissions to determine significance for this impact. The following project characteristics and assumptions were utilized in the analysis:

[26] Bay Area Air Quality Management District (BAAQMD). 2022. Project-Level Air Quality Impacts, Table 5-2, California Environmental Quality Act Air Quality Guidelines.

- Construction is estimated to begin in early 2026 and occur over approximately 2 years (based on applicant-provided information). Residential construction would occur in one phase. If the construction moves to later years, construction emissions would likely decrease due to improvements in technology and more stringent regulatory requirements.
- Demolition of two existing residences (7,503 square feet) equaling 304 tons of construction debris.
- Grading would cover approximately 21.2 acres, and approximately 129,850 yards of material would be generated from grading activities to construct the lots, streets, and foundations. Another 14,630 cubic yards of material would be generated by trench spoils and anticipated soil swelling for a total of 142,200 cubic yards of cut and fill work. As a result, the site grading would be balanced and neither off-haul nor import of dirt would be required.
- Construction of 30 single-family dwelling units (according to applicant-provided site plans, six of these would include ADUs), along with associated landscaping, and sitewide hardscape circulation (new internal roadway). The ADUs are not stand-alone and are incorporated into the construction of the single-family homes and are therefore incorporated in the square footage assumptions used in the construction-related modeling.
- Off-site improvements to Dublin Canyon Road, including the widening of Devaney Creek Bridge by approximately 13 feet, as well as the construction of 6-foot-wide bike lanes on both sides of Dublin Canyon Road along the project frontage and the creation of a 5-foot-wide sidewalk or pathway on Dublin Canyon Road to the East Bay Regional Park District trailhead and realignment of Dublin Canyon Road to allow for the addition of turning lanes and the bike lane.
- 14 daily vendor trips during the paving phase of construction.
- 15 one-way daily haul trips during the demolition phase of construction (including tree removal).

Additional details on the assumptions and inputs are included in the CalEEMod output reports (Appendix B).

Table 3.2-4 presents the proposed project total emissions and the average daily emissions from construction. The average daily emissions for criteria pollutants were estimated as: 3.87 pounds per day (lbs/day) ROG, 12.67 lbs/day NO_X, and 0.37 and 0.42 lbs/day $PM_{2.5}$ and PM_{10} exhaust. All estimated emissions are all well below the established thresholds of significance for construction of 54 lbs/day for ROG, NO_X, and $PM_{2.5}$ exhaust and 82 lbs/day for PM_{10} exhaust. In addition, IM AIR-1 would require that the proposed project implement BMPs for fugitive dust to ensure a less than significant impact for $PM_{10}/PM_{2.5}$ dust emissions. The Table 3.2-4 shows emissions from construction exhaust only.

Table 3.2-4: Construction Emissions by Construction Year

Construction by Year	Criteria Pollutant Emissions (tons)			
	ROG	NO_X	PM_{10} (Exhaust)	$PM_{2.5}$ (Exhaust)
Construction–2026	0.19	2.34	0.07	0.06
Construction–2027	0.93	1.30	0.05	0.04
Construction–2028	0.00	0.2	0.00	0.00
Total Emissions (tons)	1.12	3.66	0.12	0.11
Total Emissions (lbs)	2,234.80	7,311.70	240.62	215.42
Average Daily Emissions (lbs/day)	**3.87**	**12.67**	**0.42**	**0.37**
BAAQMD Significance Thresholds	54	54	82	54
Significant Impact?	No	No	No	No

Notes:
BAAQMD = Bay Area Air Quality Management District
lbs = pounds
NO_X = nitrogen oxides
PM_{10} = particulate matter less than 10 microns in diameter
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
ROG = reactive organic gases

This analysis relies on a 577-day construction schedule, consistent with the construction schedule and modeling results contained in Appendix B. Some construction activities may overlap. The analysis includes dust-reduction measures. Tree removal is included in the demolition phase.

The average daily emissions are calculated using 577 construction working days for the proposed project.
Source: Appendix B.

As discussed above, the proposed project's construction emissions would not exceed any of the applicable significance thresholds (with implementation of IM AIR-1). Therefore, the proposed project would have a less than significant impact related to air quality during project construction.

Operation

Following project construction, long-term operational emissions would be generated from daily operations. Operational emissions would include area, stationary, and mobile sources. Area sources would include emissions from architectural coatings, consumer products, and landscape equipment and the combustion of natural gas for water heaters and other heat sources. Mobile sources include exhaust and road dust emissions from the automobiles that would travel to and from the proposed project site. Stationary sources include emissions from stationary source equipment, such as backup generators, which would require a permit issued by the BAAQMD. However, the applicant proposes to construct 30 single-family homes, which would not require the use or implementation of backup generators.

The BAAQMD developed screening criteria for criteria air pollutants and precursors. These screening criteria provide lead agencies with a conservative indication of whether implementing a proposed

project could result in potentially significant criteria air pollutants and precursor impacts. If all screening criteria for criteria air pollutants and precursors are met by a proposed project, then the lead agency would not need to perform a detailed assessment of the project's criteria air pollutant and precursor emissions.

Section 4.1.2 of the BAAQMD's 2022 CEQA Guidelines includes preliminary screening for project operations, which provides lead agencies with a conservative indication of whether implementing the proposed project would result in the generation of operational criteria air pollutant or precursors that exceed the thresholds of significance.[27] Table 4-1 of the BAAQMD's 2022 CEQA Guidelines shows the operational screening level size by land use category and subcategory; the operational screening level for single-family homes is 421 dwelling units. Accordingly, the proposed project is well below this screening level. In addition to the single-family homes, the proposed project would create a new public trailhead, to be dedicated to the East Bay Regional Park District (EBRPD), with a restroom, parking, an equestrian staging area and a new trail providing access to the Pleasanton Ridge EBRPD trail system. This will induce additional vehicle trips for visitors of the trailhead. The BAAQMD operational screening level for the City Park land use type is 175 acres; the proposed project is below this screening level. The BAAQMD also provides a Mixed Land Use Screening Tool for Criteria Pollutants and Precursors when a project is associated with multiple land use types. According to the BAAQMD, using the screening levels in Table 4-1 for projects with multiple land use types may mischaracterize and *overestimate* the amount of project emissions. Therefore, comparison of each land use associated with the proposed project against each land use in the BAAQMD screening tables represents a conservative approach to screening. However, the proposed project was also calculated using the BAAQMD Mixed Use Screening Tool for Criteria Pollutants and Precursors, and the output indicated that the proposed project would meet operational screening, No further analysis is required. (The modeling output is available in Appendix B.) Furthermore, the operational activities would not include stationary engines or other sources subject to BAAQMD rules and regulations, nor would operational activities overlap with construction-related activities as the residences would be constructed in one phase. Therefore, the proposed project meets the operational screening criteria established by BAAQMD, and a more detailed assessment is not required. The proposed project would not result in a considerable net increase of any criteria pollutant for which the project region is nonattainment during operation or construction and impacts would be less than significant.

Operational Carbon Monoxide Hotspot

The CO emissions from traffic generated by the proposed project are a concern at the local level because congested intersections can result in high localized concentrations of CO (referred to as a CO hotspot).

The BAAQMD screening criteria were used to determine whether implementing the proposed project could result in local CO emissions that exceed the thresholds of significance. If all the

[27] Bay Area Air Quality Management District. 2022. 2022 CEQA Guidelines, Chapter 4: Screening for Criteria Air Pollutants and Precursors. April 20.

following screening criteria are met, operation of the proposed project would result in a less than significant impact related to CO:

- The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, the regional transportation plan, and local congestion management agency plans.
- Project-generated traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.
- Project-generated traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

In accordance with SB 743, transportation analysis in accordance with CEQA no longer uses delay-based metrics such as congestion to analyze project impacts. As previously discussed, the proposed project includes annexation into the City of Pleasanton, along with a General Plan Amendment of PH Overlay to LDR, a PUD rezoning. The proposed project site would be rezoned from unincorporated to Planned Unit Development-Low Density Residential (PUD-LDR). The project site was evaluated as PUD-LDR in the City's 2023–2031 Housing Element Update. Once annexed and rezoned, the proposed project would be consistent with the underlying general plan land use designation and was considered in the City's most recently adopted Housing Element. The proposed project is consistent with the land use designation defined in the City's General Plan, which is therefore consistent with the applicable congestion management program, and the proposed project is consistent with the first criterion.

The nearest intersection with recorded daily traffic volumes is Interstate 580 (I-580) and Interstate 680 (I-680) according to the Caltrans Traffic Census Program[28] which provides traffic volume data for the State highway system. According to the Traffic Census Program, the sections of I-580 near the project site (at I-680) receive a peak-hour traffic volume of 21,100 vehicles. According to the Institute of Transportation Engineers (ITE) Trip Generation Manual 10th Edition, the proposed project is anticipated to generate 407 daily trips (including the trips associated with the single-family homes, and the new trips associated with the buildout of the trail head connecting the proposed project site to the East Bay Park District). Therefore, even with the addition of daily trips generated by the proposed project, no nearby intersections impacted by the proposed project would experience traffic volumes of 24,000 to 44,000 vehicles per hour. Thus, the proposed project would not result in any nearby intersection having peak-hour traffic volumes exceeding 44,000 vehicles per hour, nor would the proposed project result in increased traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited.

Therefore, based on the above criteria, the proposed project would not exceed the CO screening criteria and would have a less than significant impact related to CO.

[28] California Department of Transportation (Caltrans). Traffic Census Program. Website: https://dot.ca.gov/programs/traffic-operations/census. Accessed June 2, 2024.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

Sensitive Receptors Exposure to Pollutant Concentrations

Impact AIR-3:	**The proposed project would not expose sensitive receptors to substantial pollutant concentrations.**

Impact Analysis

The proposed project would develop 30 single-family homes along with an internal connecting road[29] and is not expected to expose sensitive receptors to substantive DPM or TAC concentration during construction or operational activity.

Construction

To evaluate the potential health risks associated with construction of a proposed project, the BAAQMD recommends identifying receptors that may be partially affected by the proposed project. Receptors include people occupying or residing in residential dwellings (including temporary housing), places of business, educational facilities (schools, colleges, or universities), daycare centers, hospitals, detention centers, and senior-care facilities. According to BAAQMD guidance, when identifying receptors that may be affected by the proposed project, no specific project radius is recommended.

As described in the Project Description, the proposed project would demolish and reconstruct two existing single-family homes, construct 28 new single-family homes on 30 separate lots, and construct a connecting road with two entry/exit points along Dublin Canyon Road on a 128.5-acre development site. The site currently occupied by the Oak Hills Congregational Church, located at the northeast corner of the site, would continue to operate as under existing conditions.

More than 80 percent of the construction activity (25 of the 30 homes and the portion of the connecting road to those 25 homes) will take place on the southern half of the project site, which is located approximately 850 feet to 1,500 feet from existing residences (existing residences are located across Dublin Canyon Road to the north of the proposed project site and located to the west of the proposed project site). The remaining five lots with five single-family homes will be constructed on the northern portion of the site (closer to Dublin Canyon Road), along with the portion of the new road connecting those homes to Dublin Canyon Road and the entry and exit points of the new road to Dublin Canyon Road. Construction of these five homes and the northern portion of the connecting road (within the site and connecting to Dublin Canyon Road) will occur at distances of 300 feet to 700 feet from existing residential homes.

[29] The proposed project includes the construction of 28 new detached single-family residential units, the reconstruction of two existing single-family, and roadways on approximately 11.4 acres. The total project site would comprise approximately 130.90-acres, including the 11.4-acre development site, the 117.1-acre open space, and the 2.40-acre church site. Three of the proposed housing plans include ADU options ranging in size from 394 square feet to 720 square feet.

The ARB Air Quality and Land Use Handbook (ARB Handbook) provides recommendations on the siting of new development within certain distances of sources of air pollution such as freeways.[30] For example, the ARB Handbook recommends avoiding siting new sensitive land uses within 500 feet of a freeway. The ARB Handbook's distance recommendations are based primarily on data showing that air pollution exposure can be reduced by as much as 80 percent with the recommended separation. More specifically, the ARB Handbook summarizes several studies analyzing the health impacts of exposure to nearby sources of air pollution, notably freeways and major roadways. The association of traffic-related emissions with adverse health effects was seen within 1,000 feet of the source of emissions and was strongest within 300 feet, which demonstrates that the adverse effects diminished with distance. Furthermore, the ARB Handbook (which was released in 2005) notes that the risk from DPM will decrease over time as cleaner technology phases in. Therefore, for purposes of this analysis, a 300-foot project radius (from the area where construction will occur) is appropriate for defining the area where the proposed project would have the potential to expose nearby receptors to substantial pollutant concentrations.

There are no receptors (as defined by BAAQMD) within 300 feet of the proposed project's construction area. There is a church located on-site within 315 feet of the closest point of construction (Lot 5 and the eastern portion of the connecting road where it will meet Dublin Canyon Road). The majority of the construction of the proposed project would occur at distances of 500 feet or more from the church. There are residences as close as approximately 315 feet from where the new connector road will enter and/or exit at Dublin Canyon Road. The remainder of the construction associated with the proposed project would occur at distances of 400 feet to more than 1,500 feet from existing residences. Therefore, due to the distance between the proposed project and existing receptors; the temporary and diffusive nature of construction activity; and the limited duration and intensity of construction (from 30 single-family homes and one road), the construction of the proposed project would not expose sensitive populations to substantial pollutant concentrations and impacts from construction would be less than significant.

Operation

The proposed project would develop 30 single-family homes and an internal connecting road and is not expected to generate substantive DPM or TAC emissions during operational activity. The proposed project would not have stationary sources or on-site sources of TACs during operation. Traffic generated by the proposed project would consist of mostly light-duty gasoline-powered vehicles, which, unlike diesel-fueled heavy-duty trucks, are not a significant source of DPM or TAC emissions. Thus, the proposed project would not result in significant health impacts to nearby sensitive receptors during operation.

Accordingly, health impacts from operational activity associated with TACs would be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

[30] California Air Resources Board. 2005. Air Quality and Land Use Handbook: A Community Health Perspective. April.

Mitigation Measures

None.

Objectionable Odors Exposure

Impact AIR-4:	**The proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.**

Impact Analysis

Odor impacts could occur if the proposed project introduces a new odor source near existing receptors. The BAAQMD provides a list of specific odor-generating facilities. According to BAAQMD, residential uses are not odor-generating facilities.

Potential sources that may emit odors during construction activities include exhaust from diesel construction equipment. However, because of the temporary nature of these emissions, the intermittent nature of construction activities, and the highly diffusive properties of diesel PM exhaust, nearby receptors would not be affected by diesel exhaust odors associated with project construction. Odors from these sources would be localized and generally confined to the immediate area surrounding the proposed project site. The proposed project would utilize typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. Thus, the proposed project would not introduce a new odor source near existing receptors and this impact would be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

3.2.7 - Cumulative Impacts

Cumulative Analysis

The geographic area of the cumulative analysis for Impacts AIR-1 and AIR-2 is the SFBAAB. The cumulative analysis focuses on whether a specific project would result in cumulatively considerable emissions. According to Section 15064(h)(4) of the CEQA Guidelines, the existence of significant cumulative impacts caused by other projects alone does not constitute substantial evidence that the proposed project's incremental effects would be cumulatively considerable. In regard to Impact Air-1, the determination of cumulative air quality impacts on regional air quality is based on whether the proposed project would conflict with or obstruct implementation of the applicable AQP. Therefore, the proposed project would not be considered to result in a cumulatively considerable contribution to these regional air quality impacts if it does not conflict with or obstruct implementation of the applicable AQP after implementation of IM AIR-1. The proposed project does not conflict with or obstruct implementation of the applicable AQP; therefore, a less than significant cumulative impact would occur for Impact Air-1.

Regarding Impact AIR-2, the determination of cumulative air quality impacts for construction and operational emissions is based on whether the proposed project would result in emissions that exceed the BAAQMD thresholds of significance for construction and operations on a project level. The thresholds of significance represent the allowable emissions each project can generate without generating a cumulatively considerable contribution to regional air quality impacts. Therefore, a project that would not exceed the BAAQMD thresholds of significance on the project level also would not be considered to result in a cumulatively considerable contribution to these regional air quality impacts. The proposed project does not exceed BAAQMD project-level thresholds of significance for construction and operational-related emissions of criteria air pollutants. Therefore, a less than significant cumulative impact would occur regarding Impact AIR-2.

The geographic area of the cumulative analysis for Impact AIR-3 is consistent with BAAQMD recommendations. BAAQMD recommends that the analysis combine the risks and hazards from existing sources within 1,000 feet of the proposed project and compare combined risks against the BAAQMD cumulative thresholds. According to BAAQMD, the cumulative threshold addresses the potential that a project would have a cumulative significant impact if the aggregate total of all past, present, and foreseeable future sources within 1,000-foot radius results in an excess cancer risk level of more than 100 in 1 million; or a non-cancer HI greater than 10.0; or an annual average $PM_{2.5}$ concentration greater than 0.8 micrograms per cubic meter.

I-580 is within 630 feet of the proposed project boundary. According to the BAAQMD Mobile Source Screening Map, estimated health risks at the proposed project site are less than 5 in 1 million for cancer risks, less than 0.01 for $PM_{2.5}$ concentrations, and less than 0.14 for chronic hazards. There are no other freeways, major roadways, rail lines or permitted stationary sources within 1,000 feet of the proposed project's construction area or within 1,000 feet of the proposed project's boundary (Appendix B). In addition, as stated above, the proposed project would not expose nearby sensitive receptors to substantial pollutant concentrations from construction or operation. Therefore, a less than significant cumulative impact would occur regarding Impact AIR-3.

The geographic area in regard to Impact AIR-4 is a 2-mile radius around the proposed project site, as recommended by BAAQMD. A cumulative odor impact would occur if the odorous emissions from cumulative development became collectively noticeable to the community. As previously stated, the BAAQMD provides a list of recommended odor-generating facilities and single-family residential uses are not considered odor-generating uses. There are no odor-generating facilities in the relevant geographic scope and none of the cumulative projects include odor-generating uses. Therefore, cumulative impacts regarding Impact AIR-4 would be less than significant. Moreover, the proposed project would not introduce new sources of odors to nearby existing receptors and, therefore, would not contribute to a cumulatively considerable increase in odors.

Level of Cumulative Significance Before Mitigation

Less than significant impact.

Cumulative Mitigation Measures

None.

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3.3 - Biological Resources

3.3.1 - Introduction

This section describes the existing biological setting and potential impacts from project implementation on the project site and the surrounding area. This section also identifies mitigation measures to reduce these potential effects to less than significant levels where applicable. Descriptions and analysis in this section are based, in part, on field and focused surveys performed by Live Oak Associates, Inc. (LOA) on March 28, 2014; September 15, 2014; September 30, 2014; March 13, 2015; April 27 and May 19, 2015; May 30, 2019; June 14, 2016 and June 28, 2016; September 15, 2016; October 10, 2017; June 13, 2019; August 26, 2019; June 15 and 16, 2023; August 18 and 31, 2023; September 15 and 28, 2023. The findings of these surveys were published on October 5, 2023, and updated on April 10, 2025, in the Lester and Shriner's Property Biological Evaluation. A tree report was also prepared for the proposed project by HortScience|Bartlett Consulting on August 6, 2019, and updated in December 2020. Additionally, a Preliminary Jurisdictional Determination was made by United States Army Corps of Engineers (USACE) in August 2024. All reports are included in Appendix C.

One public comments was received during the Environmental Impact Report (EIR) scoping period related to biological resources.

- Requested information about the wildlife in the project location.

3.3.2 - Project History

The development site is a portion of a larger 128.5-acre site that would be subdivided into three lots as part of the proposed project (Parcel A, Parcel B, and Parcel C). Parcel A is 23.9 acres and would be developed with residential uses and open space that would be managed by a Homeowner's Association (HOA). Parcel B is 69 acres and would be managed as open space by the East Bay Regional Parks District (EBRPD). Lastly, Parcel C is 7.5 acres and would be retained to be managed by the Lester Family.

3.3.3 - Environmental Setting

The project site is located outside the northwestern-most city limits of the City of Pleasanton. The project site lies within the Alameda Creek watershed and is within the *Dublin*, *California* United States Geological Survey (USGS) 7.5-Minute Topographical Quadrangle Map.

The project site is currently undeveloped apart from residential and ranch structures present within the northeastern corner of the site. The most prevalent habitat on the project site is California annual grassland historically used as rangeland for cattle grazing. Seasonal wetlands occur in the northeastern portion of the project site near Dublin Canyon Road. Extensive riparian woodland habitat associated with Devaney Creek and its unnamed tributary occur in the southern half of the project site. Land uses surrounding the project site primarily include open space and residential development.

Oak woodland habitat characterizes the area with coast live oak trees predominating. Other tree species include California bay, big-leaf maple, valley oak, and elderberry, in addition to ornamental and fruit trees in residential areas. A total of 208 individual trees over 6 inches in diameter were observed on the project site during the 2020 Tree Report. The report documented 23 distinct tree species and identified 95 Heritage Trees. While all trees exceeding 6 inches in diameter were surveyed, only those meeting the criteria for Heritage Trees are protected under the City's Tree Protection Ordinance. Given that tree growth rates typically slow with age, it is unlikely that additional trees have reached Heritage Tree status since the 2020 report.

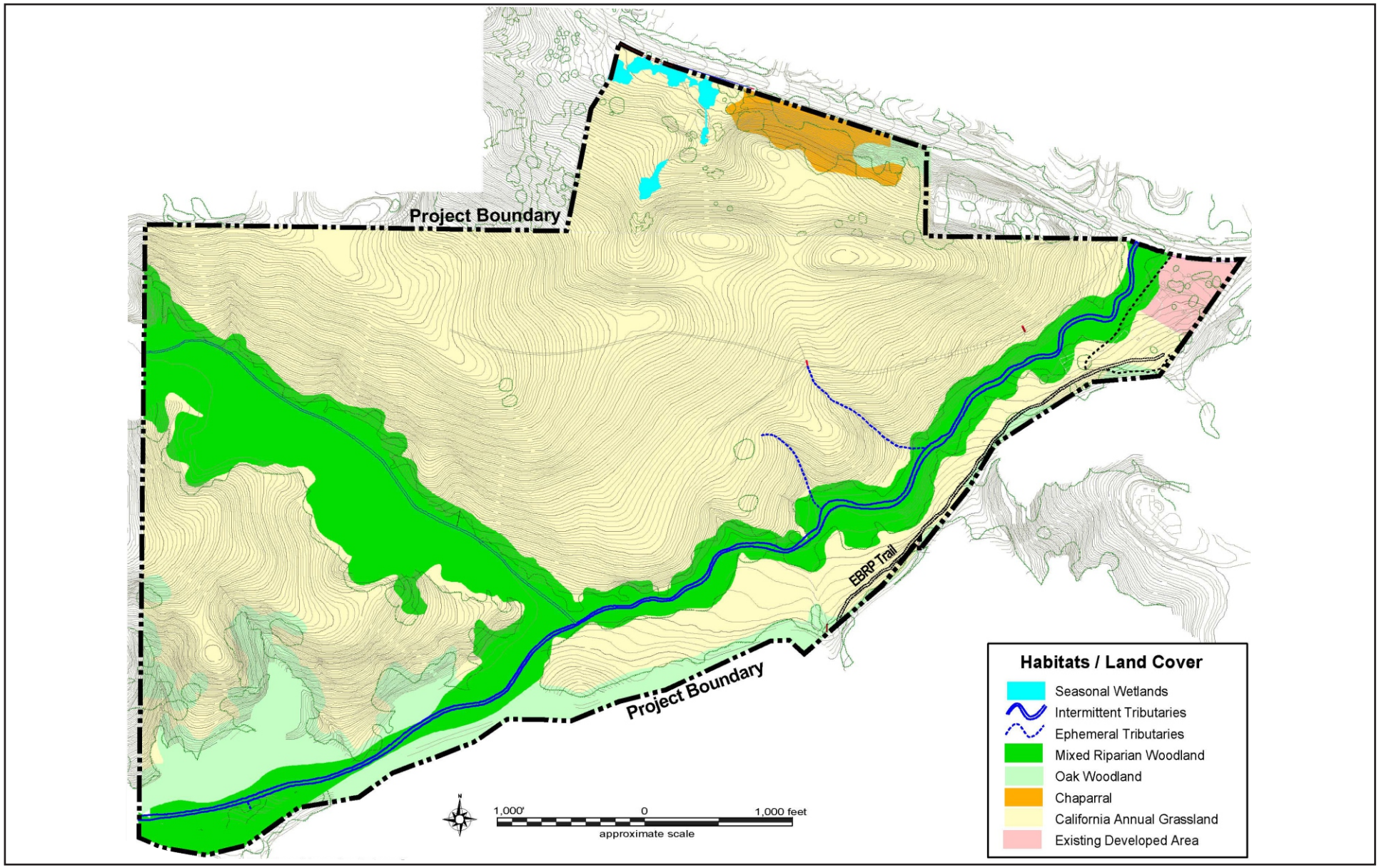
Soils, Topography, and Hydrology

Seven soil types from five soil series—Clear Lake, Diablo, Los Gatos, Los Osos, and Millsholm—were identified on the project site. Of the five soil series, Clear Lake and Diablo soils are considered hydric. Hydric soils are soils that are saturated, flooded, or ponded long enough during the growing season to develop anaerobic conditions in the upper part. Under sufficiently wet conditions, they support the growth and regeneration of hydrophytic vegetation, and seasonal wetlands do occur on Diablo soils in the northern portion of the project site. Clear Lake and Diablo soils make up a large portion of the site. The other soil types are not considered hydric, although hydric inclusions may occur. Diablo soils are mildly alkaline, and populations of Congdon's tarplant occur predominantly on this soil type on the project site; however, other soils of the site are not known to support edaphic conditions for special-status plant species (i.e., the soils of the remainder of the site are neither serpentine nor alkaline).

The project site ranges in elevation from approximately 440 feet National Geodetic Vertical Datum (NGVD) at the east end of the site to approximately 730 feet NGVD in the west end of the site. The project site consists of rangelands with Devaney Creek and its tributary running through it and a small, developed area. Seasonal wetlands occur in the northeastern portion of the property. Average annual rainfall is approximately 16 inches, most of which falls between October and April. Stormwater runoff readily infiltrates the site's soils; when field capacity has been reached, gravitational water drains into the seasonal drainages and the creek on-site as shallow groundwater or as surface sheet flow, which then flows into Devaney Creek on the opposite side of Dublin Canyon Road.

Vegetation

Five biotic habitats were identified on the 128.5-acre development site and open space, including California annual grassland, mixed riparian woodland, oak woodland, chaparral, and seasonal wetland (Exhibit 3.3-1). Each of these habitats are described below. In addition to biotic habitats, the eastern corner of the project site is developed with homes and outbuildings. A comprehensive list of plant species observed can be found within the Biological Evaluation in Appendix C.



Source: LIVE OAK ASSOCIATES, INC. October 25, 2023. Base map provided courtesy of RJA, Ruggeri-Jensen-Azar Engineers-Planners-Surveyors

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Exhibit 3.3-1
Land Cover and Vegetation Map

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California Annual Grassland–89.35 acres

The project site primarily supports California annual grassland habitat dominated by annual grasses and forbs of European origin. Vegetation identified within the annual grassland habitat of the project site during site surveys included, but was not limited to, yarrow (*Achillea millefolium*), common fiddleneck (*Amsinkia intermedia*), chamomile (*Matricaria chamomilla*), mugwort (*Artemisia douglasiana*), wild oats (*Avena fatua*), black mustard (*Brassica nigra*), ripgut brome (*Bromus diandrus*), red brome (*Bromus madritensis* ssp*. rubens*), Italian thistle (*Carduus pycnocephalus*), bindweed (*Convolvulus arvensis*), annual fireweed (*Epilobium brachycarpum*), California poppy (*Eschscholzia californica*), bedstraw (*Galium* spp.), Great Valley gum plant (*Grindelia camporum*), barley (Hordeum murinum), vetch (*Vicia* spp.), Congdon's tarplant (*Hemizonia parryi spp. congdonii*), tree of heaven (*Ailanthus altissima*), coast live oak (*Quercus agrifolia*), blue oak (*Quercus douglasii*), and black locust (*Robinia pseudoacacia*).

An unidentified tarweed (*Holocarpha* spp.) species was detected in a small area within the southeastern section of the project site. The Lester Property, Parcel C, has been grazed by cattle for several decades and supports vegetation consistent with grazed areas.

Mixed Riparian Woodland–23.4 acres

Devaney Creek, an intermittent stream fed by springs and runoff water, contains riparian habitat with a relatively dense, closed canopy. This creek system begins as two main channels with a few other drainages feeding the creek. During the May 2023 delineation survey, Devaney Creek conveyed water in sections within the property boundary. In previous surveys, Devaney Creek conveyed water intermittently, with some areas supporting flowing water while other areas were dry; feeder channels were also dry during the site visit. California bay (*Umbellularia californica)* is the dominate species of the riparian overstory. Other trees observed included California buckeye (*Aesculus californica*), madrone (*Arbutus menziesii*), fig (*Ficus carica*), walnut (*Juglans* sp.), sycamore (*Platanus acemose*), and elderberry (*Sambucus nigra* ssp*. caerulea*). Understory vegetation included, but was not limited to, coyote brush (*Baccharis pilularis*), Italian thistle, bull thistle (*Cirsium vulgare*), miner's lettuce (*Claytonia perfoliata*), wild cucumber (*Marah fabaceous*), sticky monkey flower (*Diplacusaurantiacus*), California blackberry (*Rubus ursinus*), Hedge parsley (*Torilis nodosa*), poison-oak (*Toxicodendron diversilobum*). stinging nettle (*Urtica dioica*), and periwinkle (*Vinca major*).

Channel beds were largely devoid of vegetation, with one of the culverted drainages supporting overstory similar to the riparian habitat and understory similar to the non-native annual grassland habitat. Additional vegetation includes poison hemlock (*Conium maculatum*), rabbit's foot grass (*Polypogon monspeliensis*), and stinging nettle.

Oak Woodland–10.4 acres

Relatively small areas of oak woodland are associated with the project's southeastern and southwestern edges and a small area along Dublin Canyon Road. Coast live oak dominates the overstory, which also includes the following species: tree of heaven, elderberry, and California bay. Species observed in the oak woodland understory included ripgut brome, gooseberry (*Ribes sp.*), California blackberry, bedstraw, hedge parsley, poison-oak, snowberry (*Symphoricarpos albus* var*. laevigatus*), and California wood ferns (*Dryopteris arguta*).

Chaparral–1.85 acres

Chaparral habitat occupies 1.85 acres along Dublin Canyon Road and includes the following species yarrow, coyote brush, sticky monkeyflower, poison-oak, coast live oak, elderberry, and mule's ears (*Wyethia* sp.).

Developed Land–1.42 acres

Two houses with associated outbuildings and landscaping/gardens exist within the northeastern corner of the project site, south of Devany Creek. The currently developed portion supports mainly non-native landscaped or edible plants and some non-native invasive plants, including the following asparagus (*Asparagus officinalis*), wild oats (*Avena occidentalis*), black mustard, Ripgut brome, soft chess (*Bromus hordeaceus*), Cedar (*Cedrus* spp.), bull thistle (*Cirsium vulgare*), miner's lettuce, loquat (*Eriobotraya japonica*), filaree (*Erodium spp.*), Italian rye grass (*Festuca perennis*), fig, Strawberry (*Fragaria* spp.), English ivy (*Hedera helix*), Hydrangea (*Hydrangea macrophylla*), iris (*Iris* spp.), juniper (*Juniperus* spp.), privet (*Ligustrum* spp.), magnolia (*Magnolia grandiflora*), apple (*Malus domestica*), mallow (*Malva* spp.), petunia (*Petunia integrifolia*), pine (*Pinus* spp.), smilo grass (*Piptatherum miliaceum*), and others.

Seasonal Wetlands–0.54 acre

Seasonal wetlands occur in the northern portion of the project site near Dublin Canyon Road. These seasonal wetlands meet the criteria of wetlands, including the presence of dominant hydrophytic vegetation, hydric soils, and wetland hydrology.

On-site seasonal wetlands were identified in the revised 2016 Waters of the United States map but were considered isolated by the USACE in 2017 (Appendix F of the BE). However, 2023 conditions show that these seasonal wetlands appear to be hydrologically connected to Devaney Creek. The US National Hydrography Dataset illustrates the conveyance of ephemeral flows from these seasonal wetlands to Devaney Creek just past the northern boundary of the project site. Additionally, these seasonal wetlands appear to have a contiguous surface connection to an off-site roadside ditch that drains into two large culverts conveying flows underneath Dublin Canyon Road and appearing to contribute flows to Devaney Creek. Based on a 2023 site visit, the USACE issued a Preliminary Jurisdictional Determination (PJD) on August 15, 2024, and accepted all features on-site as under their jurisdiction including seasonal wetlands (0.54 acre), tributary waters (1.48 acres and 6,997 linear feet), seasonal wetland gulley (0.001 acre and 71 linear feet), and a roadside ditch (0.06 acre and 266linear feet). The PJD and corresponding verified delineation map can be found in Appendix C.

Similar to the 2016 survey, all of these seasonal wetlands were completely dry and dominated by non-native wetland species, including poison hemlock and perennial wildrye. Other vegetation included irisleaf rush (*Juncus xiphiodes*). Other non-dominant vegetation included rabbitsfoot grass, mugwort, and curly dock (*Rumex crispus*).

A seasonal wetland gully conveyed flows from upslope seasonal wetland swales to downslope seasonal wetland swales. Dilapidated pipes occurred within these gullies, indicating either current or remnant water conveyance usage. This seasonal wetland gully exhibited an unstable bank and bed mostly barren of vegetation. However, the bed supported some hydrophytic vegetation including

hyssop loosestrife (*Lythrum hyssopifolia*), scarlet pimpernel (*Lysimachia arvensis*), and rabbits foot grass. Prominent redoximorphic features were evident in the soil profile, indicating hydric soils. Wetlands hydrology indicators included the presence of reduced iron, drainage patterns, and saturation visible on aerial imagery.

The source of hydrology for one of the seasonal wetlands is a drainage that occurs off-site to the west on the adjacent property. Water from the adjacent property enters the project site within a swale that lacks a defined bed and bank. These waters percolate into the soils on the site and within a low depression along the shoulder of Dublin Canyon Road, adjacent to the site's northern boundary. Because these seasonal wetlands were dominated by non-native vegetation and only appear to be inundated immediately following heavy storm events, these features would not be expected to provide high habitat value for native wildlife over and above that of surrounding annual grassland habitats. The species expected to occur in this habitat would be similar to those occurring in the surrounding upland habitats.

Wildlife

Amphibians

On-site drainages that convey water provide a seasonal source of drinking water for species occurring in surrounding habitats and, when wet, also provide breeding habitat for Pacific treefrogs (*Hyla regilla*) and potential movement habitat for California red-legged frogs (*Rana draytonii*). Leaf litter and decaying logs provide a moist microclimate suitable for additional amphibians such slender salamander (*Batrachoseps mexicana*), arboreal salamander (*Aneides lugubris*), and California newt (*Taricha torosa*). A comprehensive list of all wildlife species observed on the project site can be found in the BE, located in Appendix C.

Birds

Numerous resident and migratory birds breed and forage on the project site. Avian species observed within the project site during the site visits include, but are not limited to: domestic chickens (*Gallus* spp.), American crow (*Corvus brachyrhynchos*), turkey vulture (*Cathartes aura*), red-tailed hawk (*Buteo jamaicensis*), wild turkey (*Meleagris gallopavo*), northern flicker (*Colaptes auratus*), Steller's jay (*Cyanocitta stelleri*), black phoebe (*Sayornis nigricans*), barn swallow (*Hirundo rustica*), cliff swallow (*Petrochelidon pyrrhonota*), California towhee (*Melozone crissalis*), and others.

Other species expected to occur in this habitat include Cooper's hawk (*Accipiter cooperii*), red-shouldered hawk (*Buteo lineatus*), great horned owl (*Bubo virginianus*), Anna's hummingbird (*Calypte anna*), downy woodpecker (*Picoides pubescens*), Nuttall's woodpecker (*Picoides nuttallii*), and American goldfinch (*Carduelis tristis*).

Mammals

Mammals either directly observed or for which evidence of their presence was observed (scat, tracks, etc.) during site surveys were limited to Botta's pocket gopher (*Thomonys bottae*), coyote

(*Canis latrans*), black-tailed deer (*Odocoileus hemionus columbianus*), brush rabbit (*Sylvilagus bachmani*), eastern fox squirrel (*Sciurus niger*), and domestic cattle (*Bos taurus)*.

Neither California ground squirrels (*Otospermophilus beecheyi*) nor their burrows were observed during site visits, likely due to an ongoing ground squirrel eradication effort on the ranch for several years by the landowner. Although not observed, other small mammals that may occur in this habitat include western harvest mouse (*Reithrodontomys megalotis*), California meadow vole (*Microtus californicus*), deer mouse (*Peromyscus maniculatus*), western gray squirrel (*Sciurus griseus*), striped skunk (*Mephitis mephitis*), and raccoon (*Procyon lotor*).

Reptiles

Several reptile species were observed during site visits. These included western fence lizard (*Sceloporus occidentalis*), Skilton skink (*Eumeces skiltonianus skiltonianus*), California alligator lizard (*Elgaria multicarinata*), gopher snake (*Pituophis catenifer*), California kingsnake (*Lampropeltis californiae*), and northern Pacific rattlesnake (*Crotalus oreganus oreganus*).

It is possible that Alameda whipsnakes (*Masticophis lateralis euryxanthus*) may use different habitats within the project site for hibernation, food sources, and foraging opportunities.

3.3.4 - Special-status Species

Special-status species are plant and animal species that have been afforded special recognition by federal, State, or local resource agencies or organizations. Listed and special-status species are of relatively limited distribution and may require specialized habitat conditions. Special-status species are defined as meeting one or more of the following criteria:

- Listed or proposed for listing under the California Environmental Species Act (CESA) or the federal Environmental Species Act;
- Protected under other regulations (e.g., the Migratory Bird Treaty Act [MBTA];
- Designated as a California Department of Fish and Wildlife (CDFW) Species of Special Concern;
- Ranked by the California Native Plant Society (CNPS); or
- Receive consideration during environmental review under the California Environmental Quality Act (CEQA).

Special-status Plants

The California Natural Diversity Database (CNDDB) and CNPS identified 23 special-status or sensitive plant species that have been recorded within the *Dublin, California* quadrangle and the eight surrounding quadrangles (Appendix C). However, only Congdon's tarplant (*Centromadia parryi* ssp. *Congdonii*) was found on the project site. All remaining special-status plant species have been determined unlikely to occur on-site based upon the results of the species review, habitat present, and the nine focused botanical surveys conducted in 2014, 2016, 2017, 2019, and 2023.

Congdon's Tarplant

The Congdon's tarplant is a special-status plant species with a California Rare Plant Rank of 1B.1. Plants with this rank are considered rare, threatened, or endangered in California and elsewhere. This species is also a focal species of the East Alameda County Conservation Strategy (EACCS). The Congdon's tarplant is found within valley and foothill grasslands and on alkaline soils. The CNDDB reports a total of 25 populations of Congdon's tarplant within a 10-mile radius of the site with populations ranging from just two plants to 240,000 plants, with one population supporting an undisclosed number of plants and two populations reported as extirpated. This species was found present on the site within both the proposed development/grading footprint and conservation lands. Populations were surveyed between 2014 and 2023 with populations varying in abundance. For example, in 2014, an estimated 1.9 acres of occupied lands and 74,000 estimated individuals occurred on areas of the site proposed for in-perpetuity preservation, versus approximately 1.8 acres and approximately 66,000 individuals in 2019. Throughout the nine survey years, most populations were less than 10,000 plants, with some notable exceptions such as population nine, whose population ranged from 3,119 in 2017 to 676,515 in 2023. Population nine is in the proposed conservation area.

Special-status Wildlife

The CNDDB identified 22 federally and State-listed threatened and/or endangered wildlife species and Species of Special Concern within the *Dublin, California* quadrangle and its eight surrounding quadrangles (Appendix C). Out of these 22 species, 10 were identified as having potential to be present within the project site. These 10 species are identified and discussed in Table 3.3-1. The BE discusses these species in detail, including California red-legged frog, Alameda whipsnake, Crotch's bumble bee (*Bombus crotchii*), San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*), ringtail (*Bassariscus astutus*), American badger (*Taxidea taxus*), golden eagle (*Aquila chrysaetos*), white-tailed kite (*Elanus leucurus*), northern harrier (*Circus cyaneus*), and protected functional groups such as nesting and migratory birds, which are described in further detail below.

Table 3.3-1: Special-status Wildlife Species Habitat Value Evaluation

Scientific Name Common Name	Status		Habitat Description[3]	Potential to Occur and Rationale
	USFWS[1]	CDFW[2]		
Amphibians				
Rana draytonii California red-legged frog (CRLF)	FT	SSC	Rivers, creeks, and stock ponds of Sierra foothills and coast range, preferring pools with overhanging vegetation.	**Possible:** Live Oak Associates, Inc. (LOA) herpetologists found that breeding habitat for CRLF is absent from the site as the creek and other drainages lack deep pools of water required for breeding. Devany Canyon may act as a dispersal corridor for CRLF should CRLF occur in nearby stock ponds or pools. Much of this canyon and the eastern section of the project site is within Critical Habitat designated by

Scientific Name Common Name	Status USFWS[1]	 CDFW[2]	Habitat Description[3]	Potential to Occur and Rationale
				the United States Fish and Wildlife Service (USFWS) for CRLF. The site is within modeled potential upland habitat for CRLF.
Reptiles				
Masticophis lateralis euryxanthus Alameda whipsnake	FT	ST	Ranges from inner coast range in western and central Contra Costa and Alameda counties. Typically occurs in chaparral and scrub habitats with rock outcrops and talus pilings. Also occurs in scrub communities, grasslands, oak, and oak/bay woodlands.	**Possible:** LOA herpetologists found that suitable habitat exists on-site for all life stages of Alameda whipsnake. Rock piles provide hibernacula and food sources, riparian and mixed woodlands occurring on-site provide suitable habitat, and grasslands are adjacent to these woodlands, which may be used for feeding and dispersal habitat. The site is located almost entirely within Critical Habitat designated by the USFWS for Alameda whipsnake. The site is within Alameda whipsnake Recovery Unit 3 mitigation area of the East Alameda County Conservation Strategy (EACCS).
Invertebrates				
Bombus crotchii Crotch's Bumble bee		SC	In California, inhabits open grassland and scrub habitats of the southern 2/3 of California. Historically in, but largely extirpated from the Central Valley. Flight period for queens is late February to late October peaking in April and July; flight period for males and workers is March through September peaking in early July. Constructs nests underground in animal burrows. Overwintering sites are likely in soft soils or in debris or leaf litter.	**Possible.** The site is potentially suitable for the Crotch bumble bee; however, the presence of abundant nectar sources have yet to be assessed. The closest documented observation of this species is more than 3 miles from the site (California Department of Fish and Wildlife [CDFW] 2025).
Birds				
Circus cyaneus Northern harrier	—	SSC	Frequents meadows, grasslands, open rangelands, freshwater emergent wetlands; uncommon in wooded habitats.	**Possible:** Potentially suitable breeding and foraging habitat for this species is present on the site.
Aquila chrysaetos Golden eagle	— MBTA	FP FGC	Typically frequents rolling foothills, mountain areas,	**Possible:** While large trees on the site provide breeding habitat for this species, field surveys conducted

Scientific Name Common Name	Status USFWS[1]	 CDFW[2]	Habitat Description[3]	Potential to Occur and Rationale
			woodland areas, sage-juniper flats, and desert habitats.	in 2014 did not detect golden eagle nests on the site. Foraging habitat is also present on the site. Golden eagles are known to occupy a nest site approximately five miles southwest of the site. The project site is located within modeled potential foraging and nesting habitat in the EACCS.
Elanus leucurus White-tailed kite	— MBTA	FP	Open grasslands and agricultural areas throughout central California.	**Possible.** Potentially suitable breeding and foraging habitat for this species is present on the site.
Athene cunicularia Burrowing owl	— MBTA	SSC FGC	Open, dry grasslands, deserts, and ruderal areas. Requires suitable burrows. Often associated with California ground squirrels.	**Absent.** No burrowing owls have ever been documented on-site during numerous surveys since 2014. The closest sightings are about 2.7 miles east of the site in the Dublin region east of Doughtery Road and about 2.5 miles south of the site along Pleasanton Ridge**.**
Mammals				
Neotoma fuscipes annectens San Francisco dusky-footed woodrat	—	SSC	Hardwood forests, oak riparian, and shrub habitats.	**Possible:** Riparian woodlands provide potentially suitable habitat for this species. However, no woodrat nests were observed during the site visit, and the nearest documented occurrence of this species is over 3 miles west of the site.
Taxidea taxus American badger	—	SSC	Found in drier open stages of most shrub, forest, and herbaceous habitats with friable soils. Requires sufficient food sources (rodents), friable soils, and open, uncultivated ground. Digs large burrows.	**Possible:** Although no badger sign was observed during any survey from 2014 to 2025 site visit. Suitable habitat exists on-site for badgers. The nearest documented occurrence of this species is approximately four miles to the northeast of the site. The site is located within modeled potential habitat for badgers in the EACCS.
Bassariscus astutus Ringtail	—	FP FGC	Rocky or talus slopes in semi-arid or riparian habitats.	**Possible:** Suitable habitat is restricted to riparian woodlands on-site. Ringtails have not been documented within 3 miles of the site.

Scientific Name / Common Name	Status		Habitat Description[3]	Potential to Occur and Rationale
	USFWS[1]	CDFW[2]		

Code Designations

[1] Federal Status: 2025 USFWS Listing	[2] State Status: 2025 CDFW Listing
FT = Listed as threatened under the Endangered Species Act.	**ST** = Listed as threatened under CESA.
MBTA = protected by Migratory Bird Treaty Act	**SC** = Candidate for listing under CESA.
— = Not federally listed	**SSC** = Species of Special Concern as identified by CDFW.
	FP = Listed as fully protected under the Fish and Game Code.
	FGC = protected by Fish and Game Code Section 3503.5
	— = Not State-listed

[3] **Habitat description**: Habitat description adapted from California Natural Diversity Database (CNDDB).

California Red-legged Frog

The United States Fish and Wildlife Service (USFWS) listed the California red-legged frog (CRLF) as Threatened under authority of the federal Endangered Species Act. The species has been extirpated from 70 percent of its historic range and remaining populations are currently threatened by a wide variety of human impacts.

Although protocol-level CRLF surveys were not conducted, LOA Biologists visited the site on March 28, 2014, to evaluate potential presence of CRLF habitat. Although much of the project site (the western portion) is within Critical Habitat for CRLF, the site only supports dispersal habitat for CRLF in the form of Devaney Canyon and does not support breeding habitat for CRLF, as permanent aquatic habitats and deep pools of water were lacking in stream channels. Downstream habitat within Devaney Creek does not appear to support suitable habitat for CRLF. Surveys to evaluate suitability of nearby off-site stock ponds for CRLF were not conducted. CRLF movement through the project site is unlikely due to existing residential development and potential predator encounters.

Alameda Whipsnake

The Alameda whipsnake is a federally and State-listed threatened species. LOA Biologists concluded that suitable habitat does occur on the project site for all life stages of Alameda whipsnake. Rock piles provide hibernacula and food sources, riparian and mixed woodlands provide suitable habitat, and grasslands adjacent to these woodlands may be used as foraging and dispersal habitat. Almost the entire site is located within Critical Habitat designated by the USFWS for Alameda whipsnake, and suitable habitat also occurs within adjacent open space areas.

Other Special Special-Status Species

Other species with potential to occur on the project site include white-tailed kite, northern harrier, Crotch's bumble bee, golden eagle, San Francisco dusky-footed woodrat, American badger, and ringtail.

White-tailed kite, northern harrier, golden eagle, San Francisco dusky-footed woodrat, and ringtail may occur more frequently as regular foragers or may be resident on the project site. These species

may use the site infrequently or may forage on the site year-round or during migration. American badger may occur on the site more frequently due to the presence of suitable denning and foraging habitat. Although no burrowing owls have been observed on the site and are presumed absence due to the failure to detect them during numerous surveys from 2014 to 2025. Nonetheless, as burrowing owls are volant species, while unlikely, there is the possibility of the burrowing owl colonizing the site prior to construction activities are initiated on-site.

3.3.5 - Regulatory Framework

Federal

Endangered Species Act

The United States Congress passed the Endangered Species Act in 1973 to protect those species that are endangered or threatened with extinction. The Endangered Species Act is intended to operate in conjunction with the National Environmental Policy Act (NEPA) to help protect the ecosystems upon which endangered and threatened species depend.

The Endangered Species Act prohibits the "take" of endangered or threatened wildlife species. Take is defined to include harassing, harming, pursuing, hunting, shooting, wounding, killing, trapping, capturing, or collecting wildlife species or any attempt to engage in such conduct (16 United States Code [USC] § 1531 *et seq*.). "Harm" is further defined to include significant habitat modification or degradation that results in death or injury to listed species by significantly impairing behavioral patterns (50 Code of Federal Regulations [CFR] § 17.3). "Harass" is defined as actions that create the likelihood of injury to listed species to such an extent as to significantly disrupt normal behavior patterns (50 CFR § 17.3). Actions that result in take can result in civil or criminal penalties.

The Endangered Species Act and the Clean Water Act (CWA) Section 404 guidelines prohibit the issuance of wetland permits for projects that jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species. The USACE must consult with the USFWS and/or the National Marine Fisheries Service (NOAA Fisheries) when threatened or endangered species under their jurisdiction may be affected by a proposed project. In the context of the proposed project, Endangered Species Act consultation would be initiated if development resulted in take of a threatened or endangered species or if issuance of a Section 404 permit or other federal agency action could result in take of an endangered species or adversely modify critical habitat of such a species.

Migratory Bird Treaty Act

Raptors (birds of prey), migratory birds, and other avian species are protected by a number of State and federal laws. The federal MBTA prohibits the killing, possessing, or trading of migratory birds except in accordance with regulations prescribed by the Secretary of the Interior.

Clean Water Act

Section 404

The agencies are in receipt of the U.S. Supreme Court's May 25, 2023 decision in the case of *Sackett v. Environmental Protection Agency*. In light of this decision, the agencies will interpret the phrase

"waters of the United States" consistent with the Supreme Court's decision in the *Sackett* case. In *Sackett*, the Supreme Court adopted the *Rapanos* plurality's test for adjacent wetlands: only those wetlands with a continuous surface connection to other regulated waters, such that the two are indistinguishable.

The USACE administers Section 404 of the federal CWA, which regulates the discharge of dredge and fill material into waters of the United States. The term "waters of the United States" is defined in USACE regulations at 33 Code of Federal Regulations Part 328.3(a) as:

1. Waters which are:
    a. Currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
    b. The territorial seas; or
    c. Interstate waters;
2. Impoundments of waters otherwise defined as waters of the United States under this definition, other than impoundments of waters identified under paragraph (a)(5) of this section;
3. Tributaries of waters identified in paragraphs (a)(1) or (2) of this section that are relatively permanent, standing or continuously flowing bodies of water;
4. Wetlands adjacent to the following waters:
    a. Waters identified in paragraph (a)(1) of this section; or
    b. Relatively permanent, standing or continuously flowing bodies of water identified in paragraph (a)(2) or (a)(3) of this section and with a continuous surface connection to those waters;
5. Intrastate lakes and ponds not identified in paragraphs (a)(1) through (4) of this section that are relatively permanent, standing or continuously flowing bodies of water with a continuous surface connection to the waters identified in paragraph (a)(1) or (a)(3) of this section.

The following are not "waters of the United States":

1. Waste treatment systems, including treatment ponds or lagoons, designed to meet the requirements of the Clean Water Act;
2. Prior converted cropland designated by the Secretary of Agriculture. The exclusion would cease upon a change of use, which means that the area is no longer available for the production of agricultural commodities. Notwithstanding the determination of an area's status as prior converted cropland by any other federal agency, for the purposes of the Clean Water Act, the final authority regarding Clean Water Act jurisdiction remains with the United States Environmental Protection Agency (EPA);
3. Ditches (including roadside ditches) excavated wholly in and draining only dry land and that do not carry a relatively permanent flow of water;
4. Artificially irrigated areas that would revert to dry land if the irrigation ceased;

5. Artificial lakes or ponds created by excavating or diking dry land to collect and retain water and which are used exclusively for such purposes as stock watering, irrigation, settling basins, or rice growing;
6. Artificial reflecting or swimming pools or other small ornamental bodies of water created by excavating or diking dry land to retain water for primarily aesthetic reasons;
7. Waterfilled depressions created in dry land incidental to construction activity and pits excavated in dry land for the purpose of obtaining fill, sand, or gravel unless and until the construction or excavation operation is abandoned and the resulting body of water meets the definition of waters of the United States; and
8. Swales and erosional features (*e.g.,* gullies, small washes) characterized by low volume, infrequent, or short duration flow.

Waters of the United States do not include prior converted cropland. Notwithstanding the determination of an area's status as prior converted cropland by any other federal agency, for the purposes of the CWA, the final authority regarding CWA jurisdiction remains with the EPA and/or USACE.

"Wetland" refers to areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and seasonal wetlands. Wetlands are considered jurisdictional if they fall under one of the categories of waters of the United States defined above. The USACE jurisdiction typically extends up to the ordinary high water mark (OHWM).

In general, a USACE permit must be obtained before placing fill in wetlands or other waters of the United States. The type of permit depends on the impacted acreage, the purpose of the proposed fill, and other factors.

Section 401

Section 401 of the CWA states that "any applicant for a federal permit for activities that involve a discharge to waters of the State, shall provide the federal permitting agency a certification from the State in which the discharge is proposed that states that the discharge will comply with the applicable provisions under the federal Clean Water Act." Therefore, before the USACE will issue a Section 404 permit, applicants must apply for and receive a Section 401 Water Quality Certification from the Regional Water Quality Control Board (RWQCB).

State

California Endangered Species Act

The State of California enacted CESA in 1984. CESA pertains to State-listed endangered and threatened species. CESA requires State agencies to consult with the CDFW when preparing CEQA documents. The purpose of CESA is to ensure that the lead agency actions do not jeopardize the continued existence of a listed species or result in the destruction or adverse modification of habitat essential to the continued existence of those species, if there are reasonable and prudent

alternatives available (Fish and Game Code [FGC] § 2080). CESA directs agencies to consult with CDFW on projects or actions that could affect listed species, directs CDFW to determine whether jeopardy would occur, and allows CDFW to identify "reasonable and prudent alternatives" to the proposed project consistent with conserving the species. CESA allows CDFW to authorize exceptions to the State's prohibition against take of a listed species if the take is incidental to carrying out an otherwise lawful project that has been approved under CEQA (FGC § 2081).

California Fish and Game Code

The California Fish and Game Code defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill" (FGC § 86). Except for take related to scientific research, all take of fully protected species is prohibited. Fully protected fish species are protected under Fish and Game Code Section 5515; fully protected amphibian and reptile species are protected under Section 5050; fully protected bird species are protected under Section 3511; and fully protected mammal species are protected under Section 4700. Fish and Game Code Section 3503 prohibits the killing of birds or the destruction of bird nests. Section 3503.5 prohibits the killing of raptor species and the destruction of raptor nests. Fish and Game Code Sections 2062 and 2067 define "endangered and threatened species."

California Department of Fish and Wildlife Species of Concern

In addition to formal listing under the Endangered Species Act and CESA, certain species receive additional consideration by CDFW and local lead agencies during the CEQA process. Species that may be considered for review are included on a list of "Species of Special Concern," developed by the CDFW that tracks species in California whose numbers, reproductive success, or habitats may be threatened. In addition to Species of Special Concern, the CDFW identifies animals that are tracked by the CNDDB but warrant no federal interest and no legal protection. These species are identified as "California Special Animals."

Porter-Cologne Water Quality Control Act

The CDFW is a trustee agency that has jurisdiction under Fish and Game Code Section 1600, *et seq*. Under Fish and Game Code Sections 1602 and 1603, a private party must notify the CDFW if a proposed project would "substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake designated by the department, or use any material from the streambeds . . . except when the department has been notified pursuant to Section 1601." Additionally, the CDFW may assert jurisdiction over native riparian habitat adjacent to aquatic features, including native trees over 4 inches in diameter at breast height (DBH). If an existing fish or wildlife resource may be substantially adversely affected by the activity, CDFW may propose reasonable measures that will allow protection of those resources. If these measures are agreeable to the parties involved, they may enter into an agreement with CDFW identifying the approved activities and associated mitigation measures.

Section 13260(a) of the Porter-Cologne Water Quality Control Act (contained in the California Water Code) requires any person discharging waste or proposing to discharge waste, other than to a community sewer system, within any region that could affect the quality of the waters of the State

(all surface and subsurface waters) to file a report of waste discharge. The discharge of dredged or fill material may constitute a discharge of waste that could affect the quality of waters of the State.

Historically, California relied on its authority under Section 401 of the CWA to regulate discharges of dredged or fill material to California waters, which requires an applicant to obtain "water quality certification" from the State Water Resources Control Board (State Water Board) through one of its nine RWQCBs to ensure compliance with State water quality standards before certain federal licenses or permits may be issued. The permits subject to Section 401 include permits for the discharge of dredged or fill material (CWA Section 404 permits) issued by the USACE. Waste discharge requirements under the Porter-Cologne Water Quality Control Act were typically waived for projects requiring certification. With the recent changes that limited the jurisdiction of wetlands under the CWA, the State Water Board has needed to rely on the report of the waste discharge process.

California Native Plant Society

The CNPS maintains a rank of plant species native to California that has low population numbers, limited distribution, or are otherwise threatened with extinction. This information is published in the Inventory of Rare and Endangered Vascular Plants of California. Potential impacts to populations of CNPS ranked plants receive consideration under CEQA review. The following identifies the definitions of the CNPS ranks:

- **Rank 1A:** Plants presumed extirpated in California and either rare or extinct elsewhere
- **Rank 1B:** Plants Rare, Threatened, or Endangered in California and elsewhere
- **Rank 2A:** Plants presumed extirpated in California but common elsewhere
- **Rank 2B:** Plants rare, threatened, or endangered in California, but more numerous elsewhere
- **Rank 3:** Plants about which more information is needed
- **Rank 4:** Watch List: Plants of limited distribution

Potential impacts to populations of California Rare Plant Rank (CRPR) ranked plants receive consideration under CEQA review. All plants appearing on the CNPS List ranked 1 or 2 are considered to meet the CEQA Guidelines Section 15380 criteria. Rank 3 and 4 plants do not automatically meet this definition. Rank 4 plants do not clearly meet CEQA standards and thresholds for impact considerations. Nevertheless, some level of CEQA review is justified for CRPR 4 taxa, and under some circumstances, a full impact analysis is warranted. Taxa that can be shown to meet the criteria for endangered, rare, or threatened status under CEQA Section 15380(d) or that can be shown to be regionally rare or unique as defined in CEQA Section 15125(c) must be fully analyzed in a CEQA document. Some circumstances, such as local rarity, having occurrences peripheral to the taxon's distribution, or having occurrences on unusual substrates or rare and declining habitats, provide justification for treating some CRPR 4 taxa occurrences as regionally rare or unique. One limitation to fully analyzing impacts on CRPR 4 taxa is the difficulty in obtaining current data on the number and condition of the occurrences.

Local

East Alameda County Conservation Strategy

The project site occurs within Conservation Zone (CZ) 8 of the EACCS study area.[1] The EACCS document provides "context and guidance to project applicants, local jurisdictions with permit authority, and resource agencies in determining the potential impacts of a project and the level and type of mitigation necessary to offset those impacts." This document suggests a standard mitigation ratio of 3:1 for impacted land, which may vary depending on type of habitat lost and type of CZ the project is within. There are 10 animal species and five plant species that are considered "focal species" of the plan, and standardized mitigation ratios are provided for each of these species for impacts based on individual species, the relevant CZ, and habitat quality scoring for impacted habitat and proposed mitigation habitat.

Pleasanton General Plan

The Pleasanton General Plan was adopted in 2009 and includes policies on Heritage Tree preservation and grading cessation when historic artifacts are found. These policies are listed below:

Goal 1 Practice sustainability to preserve and protect natural resources and open space.

Goal 2 Preserve and enhance the natural resources of the Planning Area, including plant and wildlife habitats, Heritage Trees, scenic resources, and watercourses.

Policy 1 Preserve and enhance natural wildlife habitats and wildlife corridors.

Program 1.1 Complete a comprehensive study of the ecosystems and wildlife habitat areas within and around the Planning Area and develop and implement ordinances and policies that will provide for their preservation and enhancement.

Program 1.2 Identify land within the Planning Area which could be reclaimed as viable wildlife habitat. Study methods to re-establish viable plant and animal communities in these areas. Develop standards to accomplish habitat reclamation which: (1) specify the minimum acreage, topography, flora, fauna, and other characteristics necessary to ensure survival of wildlife habitat areas; (2) specify necessary length, breadth, flora, fauna, and other characteristics necessary to ensure the protection and use of wildlife corridors; and (3) prevent the creation of open space islands, unless they are connected through a series of viable wildlife corridors in accordance with specified standards.

Program 1.3 Preserve and enhance the resource value of wetlands through project development design measures. These measures should be based in part on jurisdictional wetlands delineation in accordance with current Army Corps of Engineers criteria, for projects which are known to have or that may have wetlands present within theirboundaries.

[1] ICF International. 2010. East Alameda County Conservation Strategy. Final Draft. October (ICF 0906.08) San José, CA. Prepared for: East Alameda County Conservation Strategy Steering Committee, Livermore, CA.

Program 1.4 Develop and implement ordinances and policies that provide for the preservation of wildlife corridors and riparian vegetation and establish mitigation requirements which minimize the barriers across wildlife corridors that roadways and developments can create.

Program 1.5 Investigate existing private, State, and federal incentive programs and develop City incentive programs that encourage property owners to cooperate in the preservation and restoration of wildlife habitat.

Program 1.6 Analyze potential impacts on wildlife populations and habitats before developing projects, using the California Environmental Quality Act (CEQA) process or other processes, as relevant.

Program 1.7 Minimize active recreation—sports, games, exercising, and fishing—within natural habitat areas. Permit passive recreation such as hiking, bicycling, horseback riding, nature and cultural resource study, photography, and picnicking.

Program 1.8 Design site sensitive recreation or interpretive facilities to minimize intrusion within natural public open space. Limit public access, including hiking trails, into sensitive habitat areas, when warranted.

Program 1.9 Plant native species wherever possible in public and private landscaping, and provide wildlife habitat in new landscaping, where appropriate.

Program 1.10 Design storm retention and drainage ponds, groundwater-recharge areas, and watercourses as wildlife habitats, when appropriate and environmentally sound.

Program 1.11 Support the efforts of the Alameda Creek Fisheries Restoration Workgroup to restore native steelhead populations in Alameda Creek.

Program 1.12 Support appropriate development intensity adjacent to areas designated as Wildlands Overlay.

Program 1.13 Provide activities and educational opportunities related to preserving and enhancing natural resources and the environment.

Policy 2 Preserve Heritage Trees throughout the Planning Area.

Program 2.1 Strongly encourage preservation of Heritage Trees; where preservation is not feasible, the City will require tree replacement or a contribution to the Urban Forestry Fund. Allow no net loss of trees.

Program 2.2 Follow the provisions of the City's Heritage Tree Ordinance, Pleasanton Municipal Code Chapter 17.16, Tree Preservation, when reviewing future development projects.

Pleasanton Municipal Code

Tree Preservation

Heritage Trees are illegal to remove without the appropriate permit. Chapter 17.16 of the Municipal Code defines a Heritage Tree as:

1. Any single-trunked tree with a circumference of 55 inches or more measured four- and one-half feet above ground level;
2. Any multi-trunked tree of which the two largest trunks have a circumference of 55 inches or more measured four and one-half feet above ground level;
3. Any tree 35 feet or more in height;
4. Any tree of particular historical significance specifically designated by official action;
5. A stand of trees, the nature of which makes each dependent upon the other for survival or the area's natural beauty.

However, the Municipal Code also states that the definition of a Heritage Tree ". . . shall not apply to fruit or nut trees when part of an orchard, the produce of which is used for commercial purposes" (Ord. 1737 § 1, 1998). Removal of Heritage Trees requires a permit from the City.

Protection of Existing Trees

Pursuant to Section 17.16.070 of the Municipal Code, all persons shall comply with the following precautions:

- Prior to the commencement of construction, install a sturdy fence at the dripline of any tree which will be affected by the construction and prohibit any storage of construction materials or other materials inside the fence. The dripline shall not be altered in any way so as to increase the encroachment of the construction.
- Prohibit excavation, grading, drainage and leveling within the dripline of the tree unless approved by the director.
- Prohibit disposal or depositing of oil, gasoline, chemicals or other harmful materials within the dripline or in drainage channels, swales or areas that may lead to the dripline.
- Prohibit the attachment of wires, signs and ropes to any Heritage Tree.
- Design utility services and irrigation lines to be located outside of the dripline when feasible.
- Retain the services of a certified consulting Arborist for periodic monitoring of the project site and the health of those trees to be preserved. The certified consulting Arborist shall be present whenever activities occur which pose a potential threat to the health of the trees to be preserved (for example, when work occurs within the dripline of trees to be preserved).
- The director shall be notified of any damage that occurs to a tree during construction so that proper treatment may be administered.

New Property Development

A. According to Section 17.16.050 New Property Development, any person desiring to remove one or more trees on any property in the City which is related to the development of such property requiring City approval or where any tree may be affected by a proposed development shall include in the application to the appropriate City reviewing body as part of the regular application, the following:
   - Depending on the scope of the development, the director may require the applicant to provide a tree survey plan, including all trees which will be affected by the new development.
   - Depending on the scope of the development, the director may require the applicant to provide a tree report by a certified consulting Arborist.
   - The tree survey plan and tree report (if any) shall be forwarded to the director.
   - The City reviewing body through its site and landscaping plan review shall endeavor to preserve all trees recommended for preservation by the director.
   - Approval of final site or landscape plans by the appropriate City reviewing body indicating which trees are to be removed shall constitute the approval and permit for the purpose of this chapter.

B. Depending on the scope of the development, the director may require that prior to acceptance of subdivision improvements or final inspection, the developer shall submit to the director a final tree report to be performed by a certified consulting Arborist.

C. Prior to the issuance of any permit allowing construction to begin, the applicant shall post cash, bond or other security satisfactory to the director, in the penal sum of greater of either $5,000.00 or the appraised value for each tree required to be preserved, up to a maximum of $100,000.

D. An applicant with a proposed development which requires underground utilities shall avoid the installation of said utilities within the dripline of existing trees whenever possible.

E. Any decision by a City reviewing body under this section may be appealed pursuant to Chapter 18.144.

Creek Setback

The City of Pleasanton determines appropriate creek setbacks on a case-by-case basis. The City establishes required setbacks, which are guided by geological stability and habitat significance to this creek to the City. The City of Pleasanton has issued a 30-foot setback from the centerline of the creek for this project.

3.3.6 - Methodology

Descriptions and analyses in this section are based on field surveys performed by LOA Biologists between May 2014 and September 2023, along with the Biological Evaluation conducted by LOA in 2023 and revised in 2025. The updated 2020 Tree Report was prepared for the proposed project by HortScience|Bartlett Consulting. It should be noted that while all trees exceeding 6 inches in diameter were surveyed during the 2020 Tree Report, only those meeting the criteria for Heritage Trees are protected under the City's Tree Protection Ordinance. Given that tree growth rates typically

slow with age, it is unlikely that additional trees have reached Heritage Tree status since the 2020 report. Therefore, the findings of the 2020 Tree Report hold true.

Literature Review

LOA Biologists reviewed existing environmental documentation for the project site and immediate vicinity. This documentation includes literature pertaining to habitat requirements of special-status species potentially occurring on or near the project site, and Federal Register listings, protocols, and species data provided by the USFWS and CDFW.

LOA Biologists reviewed the USGS 7.5-minute *Dublin, California* quadrangle map and eight surrounding quadrangles and aerial photographs as a preliminary analysis of existing conditions within the project site and immediate vicinity. Information obtained included elevation range, general watershed information, and potential drainage feature locations. Aerial photographs provide a perspective of the most current site conditions relative to on- and off-site land use, plant community locations, and potential locations of wildlife movement corridors. LOA also reviewed the United States Department of Agriculture soil data to determine whether soil conditions on-site are suitable for any special-status plant species.

LOA Biologists compiled a list of threatened, endangered, and special-status species previously recorded within the project vicinity. The list was based on a search of the CDFW's CNDDB, a special-status species and plant community account database, and the CNPS's Electronic Inventory of Rare Plants of California (CNPS Inventory). Database search results can be found in Appendix C.

Field Surveys

Botanical Surveys

Focused botanical surveys were most recently conducted on August 18 and 31 and September 15 and 28, 2023, to assess the presence of rare plant species on-site. These surveys build upon an extensive history of botanical investigation. An initial reconnaissance-level field survey was conducted for plants in 2014. This survey determined that three rare plant species have the potential to occur on-site, including big-scale balsamroot, Congdon's tarplant, and Diablo helianthella. Therefore, LOA ecologists conducted focused surveys for all three potentially occurring rare plant species again in 2014. Additional botanical surveys were conducted on September 15 and 30, 2014, September 15, 2016, October 10, 2017, and August 26, 2019.

Preliminary Jurisdictional Delineation Surveys

A formal wetland delineation was conducted on the project site in April 27 and May 19, 2015, and a follow up delineation on June 14 and June 28, 2016, by LOA. An Approved Jurisdictional Determination (AJD) was subsequently issued by USACE on September 25, 2017. Considering the expiration of an AJD, LOA ecologist Dr. Arren Allegretti conducted a formal wetland delineation on June 15 and 16, 2023. On August 15, 2024, the USACE issued a PJD that identified all aquatic features as jurisdictional including seasonal wetlands (0.54 acre), tributary waters (1.48 acres and 6,997 linear feet), seasonal wetland gulley (0.001 acre and 71 linear feet), and a roadside ditch (0.06 acre and 266 linear feet).

General Biological Surveys

LOA Biologists surveyed the proposed project site on August 18 and 31, and September 15 and 28, 2023. These surveys build upon an extensive history of biological assessments conducted between May 2014 and August 2019. The 2023 surveys were conducted to assess general site conditions, identify vegetation and wildlife habitats, and identify any potentially suitable habitat areas for various special-status plant and wildlife species. Special-status species were identified during literature review with special attention paid to sensitive habitats and areas potentially supporting special-status floral and faunal species.

Common plant species observed during these field surveys were identified by visual characteristics and morphology in the field and recorded in a field notebook.

Wildlife species detected during the field-level survey by sight, calls, tracks, scat, or other signs were recorded in a field notebook. Notations were made regarding suitable habitat for those special-status species determined to have the potential to occur within the project site. Appropriate field guides were used to assist with species identification during surveys.

3.3.7 - Thresholds of Significance

Significance Criteria

The Lead Agency has elected to derive its significance criteria based on the questions in CEQA Guidelines Appendix G Environmental Checklist. These questions reflect the input of planning and environmental professionals at the Governor's Office of Land Use and Climate Innovation (LCI) and the California Natural Resources Agency, based on input from stakeholder groups and experts in various other governmental agencies, nonprofits, and leading environmental consulting firms. They also reflect the requirements of laws other than CEQA that protect biological resources (e.g., the federal CWA, the Porter-Cologne Water Quality Control Act, the federal and State endangered species acts, and the Natural Community Conservation Planning Act). Additional is found in CEQA Guidelines Section 15065, subdivision (a)(1), which provides that a lead agency shall find that a project may have a significant effect on the environment if "[t]he project has the potential to: . . . substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; [or]substantially reduce the number or restrict the range of an endangered, rare or threatened species[.]" The "mandatory findings of significance" also address potential impacts to biological resources. Accordingly, the City has determined that impacts resulting from the implementation of the proposed project would be considered significant if the project would:

a) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service.

b) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

c) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites.

d) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

e) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

Approach to Analysis

Impacts on biological resources were evaluated based on the likelihood that special-status species, sensitive habitats, wildlife corridors, and protected trees are present on the project site and the likely effects of project construction or operation on these resources. For the purposes of this EIR, the word "substantial" as used in the significance thresholds above is defined by the following three principal components:

- Magnitude and duration of the impact (e.g., substantial/not substantial),
- Uniqueness of the affected resource (rarity), and
- Susceptibility of the affected resource to disturbance.

For purposes of this analysis, the following factors are considered when evaluating the significance of biological resources impacts resulting from implementation of the proposed project in accordance with the significance criteria listed above. Specifically, whether the project would:

- Result in direct take or habitat removal or alteration for candidate, sensitive, or special-status species;
- Remove vegetation or damage water quality related to riparian habitat or other sensitive natural community;
- Remove, fill, or damage a federally protected wetland;
- Interrupt fish movement in an aquatic channel or impede terrestrial movement via a land corridor;
- Remove, damage, or replace trees designated by the City's Tree Ordinance;
- Conflict with the provisions of an applicable habitat conservation plan.

3.3.8 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the development of the proposed project and provides suggested mitigation measures where appropriate to avoid and/or mitigate impacts to a less than significant level under CEQA.

Special-status Species

Impact BIO-1: **The proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service.**

Special-Status Plant Species

As discussed above in Section 3.3.4, Congdon's tarplant (*Centromadia parryi ssp. Congdonii*) was observed within the project site. Project construction may result in significant harm or removal of this species through habitat modification and grading. All remaining special-status plant species have been determined unlikely to occur on-site based upon the results of the species review, habitat present, and reconnaissance-level field assessments. The project is designed to avoid impacts to the most important and stable populations of Congdon's tarplant on the project site which occur on areas being conserved in perpetuity. Four new populations identified in 2023 occur in the conservation area and will be avoided by the project. However, grading and habitat modifications related to project construction would still result in significant harm or removal of Congdon's tarplant. Therefore, impacts to this species prior to mitigation would be significant. However, implementation of Mitigation Measure (MM) BIO-1a would reduce potentially significant impacts to Congdon's tarplant to a less than significant level through the preservation of estimated individuals at a mean ratio of 8:1 and instigation of a Resource Management Plan (RMP) to enhance existing habitat.

Special-Status Wildlife Species

Of the 10 special-status species mentioned in Section 3.3.4, all have the potential to occur within the project site. These species include CRLF, Alameda whipsnake, burrowing owl, American badger, San Francisco dusky-footed woodrat, ringtail, Crotch's bumble bee, along with protected functional groups such as nesting raptors and migratory birds such as the white-tailed kite, northern harrier, and golden eagle. For the remaining species discussed above, potential impacts are less than significant and therefore species-specific mitigation measures are not warranted.

California Red-legged Frog

The western portion of the project site that is proposed for in-perpetuity preservation occurs within Critical Habitat Unit ALA-1B for the CRLF, while most of the areas of the site proposed for development occur outside of and to the east of critical habitat. A habitat assessment was conducted on the site by LOA Associate Herpetologist Dr. Mark Jennings to determine whether habitat was present on the site for CRLF and for other sensitive amphibian and reptile species. Dr. Jennings determined that aquatic features of the site lacked suitable hydrology to provide breeding habitat for CRLF, and, therefore, the proposed project is not expected to result in a loss of breeding habitat for this species. Although breeding habitat is absent, CRLF may occur within the riparian corridors or in their immediate vicinity during movement and foraging activities.

The proposed project is designed and will be built and operated in ways that minimize both direct and indirect impacts to the CRLF. Clustering and siting of the proposed project allows for the in-perpetuity preservation of approximately 103.5 acres of open space outside of the grading envelope,

the majority of which is contiguous with other open space lands to the north, south, and west. This on-site preserved open space will include a mosaic of habitat types including approximately 64 acres of California annual grassland, 24 acres of mixed riparian woodland, eight acres of oak woodland, and almost 2 acres of chaparral. This conservation land avoids and minimizes impacts to CRLF habitat.

Therefore, project plans would result in a less than significant impact on CRLF upland, movement, and foraging habitat. Although the loss of habitat would be less than significant, the proposed project will result in some impacts to areas in proximity to the riparian corridors and harm or mortality to individual CRLF could occur during project construction activities should CRLF be present in these areas. Harm or mortality to individual CRLF would be considered a significant impact.

However, with implementation of MM BIO-1b, which requires avoidance, minimization, and compensatory measures, impacts to this species would be lowered to a less than significant level under CEQA.

Alameda Whipsnake

The project site is located almost entirely within Critical Habitat for the Alameda whipsnake, and the proposed project would result in the loss of approximately 24 acres of upland habitat within the grading envelope that is suitable for all life stages of the whipsnake. Additionally, suitable habitat for the Alameda whipsnake exists immediately adjacent to the project's boundaries. Therefore, the proposed project would result in the loss of approximately 24 acres of habitat for this species and could result in harm or mortality to individuals of this species, should they occur on the site during project construction activities. The loss of habitat and the potential harm or mortality to individuals of this species would be considered a significant impact of the proposed project. However, with implementation of MM BIO-1c, which requires avoidance, minimization, and compensatory measures, impacts to this species would be lowered to a less than significant level under CEQA.

Nesting Birds

Trees throughout the oak woodland and riparian woodland habitats of the project site and lone trees within the grasslands of the site provide suitable nesting habitat for tree-nesting raptors and migratory birds, including special-status species such as the white-tailed kite, northern harrier, and golden eagle. If a raptor or other migratory bird, regardless of its federal or State status, were to nest on or adjacent to the site prior to or during proposed construction activities, such activities could result in the abandonment of active nests or result in direct mortality to these birds. Construction activities that adversely affect the nesting success of raptors or result in mortality of individual birds would constitute a violation of State and federal laws and would be considered a potentially significant impact under CEQA. However, with implementation of MM BIO-1d, which requires pre-construction surveys, impacts would be reduced to a less than significant level under CEQA.

American Badger

The project site provides potential denning and foraging habitat for badgers. The proposed project would preserve in perpetuity 104.6 acres of the site as open space. This amount of open space would more than sufficiently compensate for any loss of badger habitat. Although the loss of such habitat would be a less than significant impact due to the availability of such habitat in the region

and the proposed in-perpetuity preservation of 104.6 acres of habitat on the site outside of the grading envelope, should badgers occur on the site during project ground-disturbing activities, these activities could result in harm or mortality to individual badgers, and this would be a potentially significant impact. However, with the avoidance, minimization, and compensation measures provided in MM BIO-1e, impacts to badgers would be reduced to a less than significant level under CEQA.

Crotch's Bumble Bee

There is a possibility the Crotch's bumble bee occurs on the project site. If the species occurs on-site and there is a nest underground, project-related demolition, excavation, and grading activities could result in loss of individuals. Loss of underground nests or individual bees may be considered a significant impact to Crotch's bumble bee. Accordingly, the proposed project may have a potentially significant impact. The preferred approach is to avoid and minimize impacts to them. However, if avoidance and minimization is not feasible, then the proposed project would need to compensate for the loss of habitat either on or off-site. This would likely also necessitate the need for the proposed project to obtain an Incidental Take Permit from CDFW. Therefore, the project applicant should conduct pre-activity surveys for the Crotch's bumble bee prior to ground disturbance. Harm or mortality to individual Crotch would be considered a significant impact. However, with implementation of MM BIO-1f, which requires pre-activity surveys and avoidance, minimization, and compensatory measures, impacts would be reduced to less than significant under CEQA.

San Francisco Dusky-footed Woodrats

The riparian woodlands provide potentially suitable habitat for this species. However, no woodrat nests were observed during the site visit. Should woodrats occur on the project site during project ground-disturbing activities, these activities could result in harm or mortality to individual woodrats, and this would be a potentially significant impact. MM BIO-1g which requires avoidance, minimization, and compensation measures would reduce impacts to San Francisco dusky-footed woodrats to a less than significant level under CEQA.

Ringtails

Suitable habitat is restricted to the riparian woodlands on-site. The ringtail could occur within the riparian corridor habitat of the project site. Should ringtails occur on the site during project ground-disturbing activities, these activities could result in harm or mortality to individual ringtails. Therefore, there is a small chance site development may result in direct mortality or injury to any ringtail individuals adjacent to the riparian habitat. Direct mortality or injury to an individual ringtail would be considered a significant impact under CEQA. However, measures described in MM BIO-1h would be implemented that would avoid impacts to individual ringtails and therefore reduce impacts to a less than significant level under CEQA.

Burrowing Owl

The project site does contain some suitable habitat to support this species in the form of California annual grassland. No burrowing owls have ever been documented on-site during numerous surveys since 2014. The closest sightings are about 2.7 miles east of the site in the Dublin region east of Doughtery Road and about 2.5 miles south of the site along Pleasanton Ridge. No burrowing owls

have been observed on the site and the species is presumed absent due to the failure to detect them during numerous surveys from 2014 to 2023. Nonetheless, as burrowing owls are volant species, while unlikely, there is the possibility that burrowing owl may colonize the site prior to construction activity initialization on-site. Construction activities that adversely affect the nesting success or result in mortality of individual owls would constitute a violation of State and federal law and would be a potentially significant impact. Additionally, should burrowing owls occur on the site, the proposed project could result in the loss of breeding habitat for this species, and this would also be a potentially significant impact. Therefore, prior to mitigation, impacts to burrowing owl could be potentially significant. If present, the applicant would likely be required to obtain an Incidental Take Permit from CDFW. However, with implementation of MM BIO-1i, impacts to this species will be reduced to a less than significant level under CEQA.

Level of Significance Before Mitigation

Potentially significant impact.

Mitigation Measures

MM BIO-1a Compensation Measures for Congdon's Tarplant

The project shall compensate for the loss of tarplant on the project development area via the preservation of estimated individuals at a mean ratio of 8:1. However, per the East Alameda County Conservation Strategy (EACCS), mitigation for Congdon's tarplant must also demonstrate habitat enhancement, not just preservation; therefore, a Resource Management Plan (RMP) shall be prepared and implemented, as described below by a qualified Biologist. At a minimum, the RMP shall include the following:

- Party or parties responsible for implementation of the RMP.
- Allowed and prohibited activities on preserved lands.
- The locations and types of any fencing, signs and/or displays to be constructed on preserved lands.
- A monitoring and management plan for non-native and/or invasive species considered detrimental to protected resources (i.e., weed abatement and invasive species removal).
- The types, frequency, and timing of any maintenance activities to be conducted on preserved lands (i.e., litter removal, fence or sign repairs, fire prevention activities such as mowing, etc.).
- A grazing and/or mowing component, and requirements of any grazing/mowing plan shall also be included. For grazing, this plan shall include applicable stocking rates (based on the best current information), how other sensitive resources occurring on-site such as riparian habitats will be protected (if necessary) and any monitoring requirements, such as the monitoring of Residual Dry Matter (RDM). A mowing plan shall include timing of mowing activities to best enhance habitat for this species.

- A mechanism whereby the RMP shall be funded in perpetuity. Such a mechanism would be the establishment by the applicant of a non-wasting endowment, funded by the applicant and/or through monthly Homeowner Association (HOA) fees.

MM BIO-1b Avoidance and Minimization Measures for the California Red-legged Frog

Avoidance and Minimization

Conduct protocol-level California red-legged frog (CRLF) surveys or assume presence on-site.

Implementation of the following measures, partially summarized below, shall be taken during construction to avoid harm or mortality to individual CRLF.

- Conduct protocol-level CRLF surveys or assume presence on the site.
- Prior to the start of construction, an approved qualified Biologist will train all construction personnel regarding habitat sensitivity, identification of special-status species, and required practices.
- Pre-construction surveys shall be conducted to ensure that CRLF are absent from the construction area. If CRLF are present, they shall be relocated by a qualified Biologist.
- The construction zone shall be cleared, and silt fencing shall be erected and maintained around construction zones to prevent CRLF from moving into these areas.
- A Biological Monitor shall be present on-site during times of construction, such as any impacts to the creek, to ensure no CRLF are harmed, injured, or killed during project buildout.

EACCS-specific CRLF Avoidance Minimization Measures:

- If aquatic habitat is present, a qualified Biologist shall stake and flag an exclusion zone prior to activities. The exclusion zone shall be fenced with orange construction zone and erosion control fencing (to be installed by construction crew). The exclusion zone shall encompass the maximum practicable distance from the work site and at least 500 feet from the aquatic feature wet or dry.
- A qualified Biologist shall conduct pre-construction surveys prior to construction activities (before groundbreaking). If individuals are found, work shall not begin until they are moved out of the construction zone to a United States Fish and Wildlife Service (USFWS) or California Department of Fish and Wildlife CDFW-) approved relocation site.
- A Service-approved Biologist shall be present for initial ground-disturbing activities.
- If the work site is within the typical dispersal distance (contact USFWS/CDFW for latest research on this distance for species of interest) of potential breeding habitat, barrier fencing shall be constructed around the worksite to prevent

amphibians from entering the work area. Barrier fencing shall be removed within 72 hours of completion of work.
- No monofilament plastic shall be used for erosion control.
- Construction personnel shall inspect open trenches in the morning and evening for trapped amphibians.
- A qualified Biologist possessing a valid Endangered Species Act Section 10(a)(1)(A) permit or Service approved under an active biological opinion, shall be contracted to trap and to move amphibians to nearby suitable habitat if amphibians are found inside fenced area.
- Work shall be avoided within suitable habitat from October 15 (or the first measurable fall rain of 1 inch or greater, to May 1).

In addition, the EACCS specifies that a project shall obtain an Incidental Take Permit if occupied habitat is adjacent to the site and suitable habitat is on the project site.

Compensation

The project proposes to preserve in perpetuity approximately 104.6 acres of the project site as open space outside of the grading envelope. This amount of open space would more than sufficiently compensate for any loss of CRLF upland habitat. Additionally, to ensure that mitigation habitat meets or exceeds the value of the habitat lost to development. Additionally, Focal Species Impact/Mitigation Scoring Sheets, located in Appendix E of the EACCS, were used as part of the assessment for suitability of mitigation lands for CRLF. Standardized mitigation ratios for CRLF, according to Table 3-7 in the EACCS, are 3:1 if the development area is within critical habitat and 2.5:1 if the development area is outside of critical habitat. The vast majority of the development area of the project is outside of critical habitat; therefore, the proposed project is consistent with standardized ratios set forth by the EACCS for this species.

An RMP shall be prepared explicitly to manage the proposed open space areas for potentially sensitive species potentially occurring. This plan will be submitted to the City for review and approval. At minimum, this plan should:

- Identify approaches to be used and provide evidence that sufficient water budget exist for any proposed enhancement.
- Identify a suitable planting regime for restoring or enhancing riparian habitats.
- Identify success criteria for monitoring both wetland and riparian habitats that are consistent with similar habitats regionally.
- Monitor restored or enhanced riparian habitats for 5 years.
- Define and identify maintenance and management activities to manage open space habitats to meet stated goals of supporting habitat characteristics suitable for CRLF. This would include suitable fencing to control access, limited cattle grazing or other procedures to manage grass height and forage production at levels that benefit CRLF, removal of trash.

- Define and provide for a financial mechanism such as a non-wasting endowment or an assessment district that funds open space management into perpetuity.

MM BIO-1c **East Alameda County Conservation Strategy-specific Avoidance and Minimization Measures for Alameda Whipsnake**

- No monofilament plastic shall be used for erosion control.
- Barrier fencing may be used to exclude focal reptiles. Barrier fencing shall be removed within 72 hours of completion of work.
- Construction crews or on-site Biological Monitor shall inspect open trenches in the morning and evening for trapped reptiles.
- Ground disturbance in suitable habitat shall be minimized.
- A United States Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife- (CDFW-) approved Biological Monitor shall be present for all ground-disturbing activities in suitable habitat.
- A qualified Biologist possessing a valid Endangered Species Act Section 10(a)(1)(A) permit or Service approved under an active biological opinion, and approved by the CDFW shall be contracted to trap and to move reptiles to nearby suitable habitat if listed reptiles are found inside fenced area.

Compensation

Clustering and siting of the project has also allowed for in-perpetuity preservation of 104.6 acres of open space of similar habitat quality to the approximately 24 acres that would be impacted by the project. This amount of open space would more than sufficiently compensate for any loss of Alameda whipsnake upland habitat.

Additionally, Focal Species Impact/Mitigation Scoring Sheets located in Appendix E of the East Alameda County Conservation Strategy (EACCS) were used as part of the assessment for suitability of mitigation lands for Alameda whipsnake. Standardized mitigation ratios for Alameda whipsnake, according to Table 3-9 in the EACCS, are as follows:

1. If the development area is within critical habitat and the mitigation area is within critical habitat, and both are within the same Recovery Unit (both areas in this case are within Recovery Unit 3) the mitigation ratio is 3:1.
2. If the development area is outside of critical habitat but inside a Recovery Unit and the mitigation area is outside critical habitat but inside the same recovery unit, the mitigation ratio is 3:1.
3. If the development area is outside of critical habitat but inside a Recovery Unit and the mitigation area is inside critical habit and within the same Recovery Unit, 2.5:1.
4. All other types of mitigation would require site-specific agency approval.

Areas proposed for preservation by the project would meet the EACCS goals of preserving a mosaic of habitats at an approximate 3:1 ratio, including woodland and upland habitats adjacent to riparian woodlands. The majority of the proposed open space consists of upland habitats (i.e., grasslands).

MM BIO-1d Mitigation Measures for Golden Eagle, White-tailed Kite, Norther Harrier, and Migratory Birds

Trees planned for removal shall be removed during nonbreeding season (September 1 through January 31). If it is not possible to avoid tree removal or other disturbances during breeding season (February 1 through August 31), a qualified Biologist shall conduct a pre-construction survey for tree-nesting raptors and other tree- or ground-nesting migratory birds in all trees or other areas of potential nesting habitat within the construction footprint and within 250 feet of the footprint. This survey shall be conducted no more than 7 days prior to initiation of demolition/construction activities during the early part of breeding season (February 1 through April 30), and no more than 30 days prior to initiation of these activities during the latter part of the breeding season (May 1 through August 31). If nesting raptors or migratory birds are detected on the project site during the survey, a suitable construction-free buffer will be established around all active nests. Precise dimensions of the buffer (up to 250 feet) would be determined at that time and may vary depending on location and species. Buffers will remain in place for the duration of breeding season or until it has been confirmed by a qualified Biologist that all chicks have fledged and are independent of their parents. Pre-construction surveys during nonbreeding season are not necessary, as birds are expected to abandon their roosts during construction activities. Implementation of the above measures would mitigate impacts to tree-nesting raptors and other migratory birds to a less than significant level.

Specific East Alameda County Conservation Strategy Avoidance and Minimization Measures for the golden eagle

Although nesting habitat is marginal on the development site and its proximity, in the unlikely event that an eagle did nest on the project site, the following mitigation would ensure that the project does not cause nest abandonment. Pre-construction surveys for other nesting birds and raptors shall include a survey for nesting golden eagles to determine their presence or absence within 250 feet of the development footprint.

- If an active nest is identified near a proposed work area, work shall be conducted outside of the nesting season (February 1 to September 1).
- If an active nest is identified near a proposed work area and work cannot be conducted outside of the nesting season, a no-activity zone shall be established by a qualified Biologist. The no-activity zone will be large enough to avoid nest abandonment and at a minimum will be a 250-feet radius around the nest.

- If an effective no-activity zone cannot be established in either case, an experienced golden eagle Biologist will develop a site-specific plan (i.e., a plan that considers the type and extent of the proposed activity, the duration and timing of the activity, the sensitivity and habituation of the eagles, and the dissimilarity of the proposed activity with background activities) to minimize the potential to affect the reproductive success of the eagles.

Compensation

The project proposes to preserve approximately 104.6 acres of the project site outside of the grading envelope as open space. This amount of open space would more than sufficiently compensate for any loss of golden eagle foraging habitat. Additionally, Focal Species Impact/Mitigation Scoring Sheets located in Appendix E of the EACCS were used as part of the assessment for suitability of mitigation lands for the golden eagle. Standardized mitigation ratios for the golden eagle, according to Table 3-10 in the EACCS, is 3:1 within the East Bay Hills Mitigation Area where the project and associated conservation land are sited. The majority of the area proposed for preservation consists of grassland habitat, although it also includes woodland and riparian woodland habitat.

MM BIO-1e Avoidance and Minimization Measures for American Badger

Pre-construction surveys conducted for burrowing owls (MM BIO-1i) will also be used to determine presence or absence of badgers within or immediately adjacent to the development footprint. Therefore, the burrowing owl study identified in MM BIO-1i will include American badger. If an active badger den is identified during pre-construction surveys within or immediately adjacent to the construction envelope, a construction-free buffer of up to 300 feet (or other distance specified by California Department of Fish and Wildlife [CDFW]) shall be established around the den. Because badgers are known to use multiple burrows in a breeding burrow complex, a Biological Monitor shall be present on the project site during construction activities to ensure the buffer is adequate to avoid direct impact to individuals or den abandonment. The monitor would be necessary on the project site until it is determined that any badger young are of an independent age and construction activities would not harm individual badgers. Once it has been determined that badgers have vacated the project site, burrows can be collapsed or excavated and ground disturbance can proceed.

Specific Avoidance and Minimization Measures for the badger reported in Table 3-3 of the East Alameda County Conservation Strategy (EACCS) include:

- If potential dens are located within the proposed work area and cannot be avoided during construction, qualified Biologist will determine if the dens are occupied or were recently occupied using methodology coordinated with the United States Fish and Wildlife Service (USFWS) and CDFW.

- If unoccupied, the qualified Biologist will collapse these dens by hand in accordance with USFWS procedures. Exclusion zones will be implemented following USFWS procedures or the latest USFWS procedures available at the time. The radius of these zones will follow current standards or will be as follows: Potential Den–50 feet; Known Den–100 feet; Natal or Pupping Den–to be determined on a case-by-case basis in coordination with USFWS and CDFW.
- Pipes will be capped and trenches will contain exit ramps to avoid direct mortality while construction areas is active.

Compensation

The project shall permanently protect 104.6 acres as open space, which is considered more than adequate to offset any loss of badger habitat. Additionally, Focal Species Impact/Mitigation Scoring Sheets located in Appendix E of the EACCS were used as part of the assessment for suitability of mitigation lands for the badger. Standardized mitigation ratios for the badger, according to Table 3-10 in the EACCS, is 3:1 within the East Bay Hills Mitigation Area, where the project and associated conservation land are sited.

MM BIO-1f Mitigation Measures for Crotch's Bumble Bee

A qualified Biologist shall conduct pre-construction surveys with methodology approved by the California Department of Fish and Wildlife (CDFW) during the three stages of Crotch's bumble bee flight period; once a positive identification is made, no further general surveys are necessary; at that point, intensive surveys would occur. The three stages of flight periods include: 1) queen flight after emergence is February–March; 2) highest detection time for nests is April–August; 3) queens solo flight is September–October when queens find a hibernation area. Surveys will be conducted in the two flight periods prior to the start of construction with two surveys occurring at least 3 weeks apart within each of those flight periods. These surveys will increase the likelihood this species and their underground nests are observed will they be present on the project site. Survey schedules are shown below:

Start of Construction Date	Required Survey Periods	Dates of Survey Periods
November–March	2 and 3	Two surveys April–August Two surveys September–October
April–August	3 and 1	Two surveys September–October Two surveys February–March
September–October	1 and 2	Two surveys February–March Two surveys April–August

Bumble bees observed shall be photographed and a Global Positioning System (GPS) point taken. If a Crotch's bumble bee is positively identified, general surveys shall stop and intensive surveys will begin.

General Survey Timing

This survey shall be conducted the season prior to the start of work (i.e., if work is expected to start in the late summer, surveys may occur that same year; if work is expected to start in winter or early spring, the surveys shall occur the year before).

Avoidance

Should a Crotch's bumble bee be observed, intensive surveys to locate underground nests shall be conducted. Appropriate weather for intensive surveys is warm and sunny or sunny with some overcast with temperatures between 60° Fahrenheit (degrees Fahrenheit) and 90°. Should an underground nest be located, individuals at the nest shall be photographed to confirm species. If a confirmed underground nest of Crotch's bumble bee is observed, the nest shall be flagged and a 25-foot buffer established around the nest.

Minimization

If a Crotch's bumble bee or a Crotch's bumble bee nest is observed, an avoidance plan would be developed and reviewed by CDFW prior to project work and/or vegetation removal or ground disturbance.

Compensation

If Crotch's bumble bee exists on-site and if take avoidance is not feasible, then a mitigation plan that provides for on- or off-site compensation shall be completed. The mitigation plan shall provide for a minimum of a 1:1 replacement ratio of suitable habitat. It shall define the location and whether this mitigation is on or off-site, measures to restore and/or enhance existing habitat, management strategies to maintain the conservation value of the habitat into perpetuity, and a funding source for the ongoing management.

Compensation may necessitate the need to obtain an Incidental Take Permit from CDFW under the California Endangered Species Act (CESA). If in the end, the Fish and Game Commission chooses to not list the Crotch's bumble bee under CESA, then this would vacate the need to implement the minimization and avoidance methods above.

MM BIO-1g Mitigation Measure for San Francisco Dusky-Footed Woodrats

Avoidance and Minimization

A qualified Biologist shall conduct a pre-construction survey for San Francisco dusky-footed woodrat nests no more than 30 days and no less than 14 days prior to the onset of construction activities in or within 50 feet of riparian habitat. This survey timing allows for the scheduling of and deconstruction of any woodrat nests which

need relocating. The survey shall encompass all construction zones and surrounding lands within 50 feet. If no woodrat nests are present, no additional measures are required.

A report shall be prepared for submission to the City summarizing the results of the survey which identifies any buffer zones and outlines recommended next steps, including measures implemented to prevent impacts to San Francisco dusky-footed woodrats.

Nest deconstruction

Identified nests shall be avoided, where possible. If avoidance is not possible, as determined by a qualified Biologist in coordination with the applicant, the nest(s) will be manually deconstructed by a qualified Biologist when helpless young are not present, typically during the nonbreeding season (October through January). The nest will be reconstructed in a nearby suitable area.

Construction-free buffers

If it is determined during the pre-construction survey that young may be present, a suitable buffer, delineated with flagging, depending on the timing within the breeding season (ranging from 15–50 feet) will be established around the nest by the qualified Biologist and maintained during construction until the young are independent and have successfully moved from the nest on their own.

MM BIO-1h Mitigation Measure for Ringtails

Pre-construction Survey

A qualified Biologist shall conduct pre-construction surveys for the ringtail prior to any disturbance to the property. All suitable areas within the project site shall be surveyed with walking transects within 2 days prior to the onset of construction. This survey can be conducted in conjunction with other pre-construction surveys.

Tailgate Training

All workers on the project and access corridor shall attend a tailgate training that includes a description of the species, summary of its biology, and minimization measures and instructions on what to do if a ringtail is observed.

Protective Measures for Individuals

In the event an individual is discovered within a construction zone on-site, construction would be halted until the individual self-relocates from the project site. A ringtail would not be expected to be residing within the area of development; therefore, self-relocation is believed to be inevitable. Once the Biologist has determined that the animal has moved outside of potential danger, construction activities could resume. If the ringtail is found to be residing within a construction zone on-site, an appropriate construction-free buffer (to be determined by a qualified Biologist) would be established around the area being used by the ringtail

until the nest is abandoned by adult(s) and young for the year (approximately after September).

MM BIO-1i Avoidance and Minimization Measures for Burrowing Owls

To avoid potential impacts to active burrowing owl nests and adult owls, a qualified Biologist shall conduct pre-construction surveys for burrowing owls within the construction footprint and within 250 feet of the footprint no more than 7 days prior to project ground disturbance during the early part of breeding season (i.e., February 1 through April 30), and no more than 30 days prior to onset of ground disturbance during any other times of year. These surveys shall be conducted in a manner consistent with accepted burrowing owl survey protocols. Specific Avoidance and Minimization Measures for the burrowing owl are reported in Table 3-3 of the East Alameda County Conservation Strategy (EACCS). These measures are mandatory for mitigation and include:

- If an active nest is identified near a proposed work area work will be conducted outside of the nesting season (March 15 to September 1).
- If an active nest is identified near a proposed work area and work cannot be conducted outside of the nesting season, a no-activity zone shall be established by a qualified Biologist. The no-activity zone shall be large enough to avoid nest abandonment and will at a minimum, be 250-feet radius from the nest.
- If the burrowing owls are present at the project site during the nonbreeding period, a qualified Biologist shall establish a no-activity zone of at least 150 feet.
- If an effective no-activity zone cannot be established in either case, an experienced burrowing owl Biologist shall develop a site-specific plan (i.e., a plan that considers the type and extent of the proposed activity, the duration and timing of the activity, the sensitivity and habituation of the owls, and the dissimilarity of the proposed activity with background activities) to minimize the potential to affect the reproductive success of the owls.

Compensation

To ensure that mitigation habitat meets or exceeds the value of habitat lost to development, Focal Species Impact/Mitigation Scoring Sheets located in Appendix E of the EACCS were used as part of the assessment for suitability of mitigation lands for the burrowing owl. Standardized mitigation ratios for the burrowing owl, according to Table 3-10 in the EACCS, is 3:1 within the East Bay Hills Mitigation Area where the project and associated conservation land is sited.

Level of Significance After Mitigation

Less than significant impact.

Sensitive Natural Communities or Riparian Habitat

Impact BIO-2: **The proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service.**

Impact Analysis

The project as proposed would preserve approximately 104.6 acres of on-site land outside of the grading envelope which includes a mosaic of grassland, oak woodland, and riparian woodland/aquatic habitats, much of which is contiguous with other off-site open space to the north, west, and south of the project site, while impacting approximately 30 acres of primarily grassland habitat that is mostly concentrated in the eastern portion of the project site and closer to existing off-site development. The grassland that would be affected is not considered a sensitive natural community. According to the 2025 LOA BE, the proposed project will also include the construction of an 18-inch outfall that will drain into the west side of Devaney Creek and a 24-inch outfall that drains into the east side of Devaney Creek near the vicinity of Dublin Canyon Road. Specific design details for the outfalls have not yet been determined. While these outfalls are intended to be above the OHWM, they will impact a small amount of riparian habitat in the range of 0.03 to 0.06 acre. MM BIO-3 would mitigate impacts to the riparian corridor from the outfall installation through minimization and compensation (Exhibit 3.3-2). MM BIO-3 includes minimization measures such as placing construction silt fencing around preserved aquatic features and riparian areas to ensure that construction activities do not inadvertently impact these areas. Compensation includes an Mitigation and Monitoring Plan (MMP) to compensate for the loss of 0.06 acre of riparian habitat. Additionally, MM BIO-3 will mitigate for riparian habitat and the loss of federally or State-protected wetlands, as described in Impact BIO-3 below. Therefore, through implementation of MM BIO-3 impacts to the riparian habitat would be reduced to a less than significant level under CEQA.

Level of Significance Before Mitigation

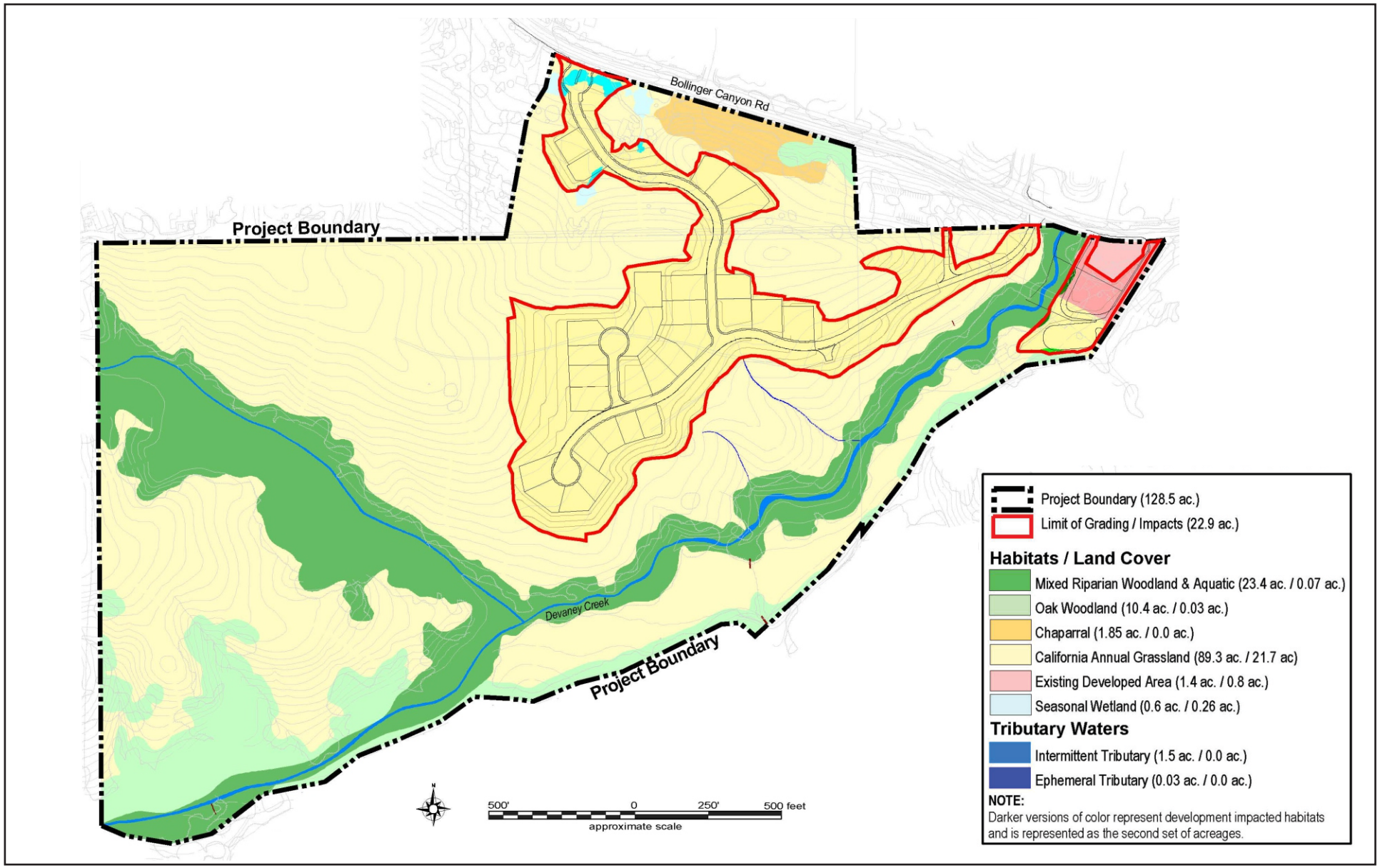
Significant impact.

Mitigation Measures

See MM BIO-3

Level of Significance After Mitigation

Less than significant impact.



Source: LIVE OAK ASSOCIATES, INC. 01/06/2025. Base map provided courtesy of RJA, Ruggeri-Jensen-Azar Engineers-Planners-Surveyors

FIRSTCARBON SOLUTIONS™

Exhibit 3.3-2
Impacts Map

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Wetlands and Jurisdictional Features

Impact BIO-3:	**The proposed project would not have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.**

Impact Analysis

A formal wetland delineation has been conducted on the project site in 2016 and 2023. The USACE has issued a Jurisdictional Determination which determined that jurisdictional waters of the United States are present on the site in the form of Devaney Creek and its unnamed tributary to the extent of the OHWM on opposing banks. Additionally, the USACE determined that approximately 0.42 acre of seasonal wetlands identified in the northern portion of the site near Dublin Canyon Road were isolated and non-jurisdictional. The USACE issued a PJD August 15, 2024, which accepted all aquatic features identified on the map as jurisdictional including seasonal wetlands (0.54 acre), tributary waters (1.48 acres and 6,997 linear feet), seasonal wetland gulley (0.001 acre and 71 linear feet), and a roadside ditch (0.06 acre and 266 linear feet).

All waters identified on the site including the creeks, ephemeral tributaries, and the seasonal wetlands would be subject to the regulatory authority of the RWQCB. The creeks on the site would also be considered jurisdictional by CDFW.

All of Devaney Creek and its unnamed tributary will be preserved by the proposed project with a setback. The project is already sited to avoid and minimize impacts to Devaney Creek and its unnamed tributary; however, complete avoidance of the seasonal wetlands will not be due to the siting of the entrance road in the northern portion of the site.

Approximately 0.25 acre of seasonal wetland on the site would be filled under the proposed project due to the entrance road from Dublin Canyon Road. Although these wetlands are densely vegetated by non-native species and appear to provide similar functions and value as the upland grasslands, filling of these features would require a permit from RWQCB and impacts to these features may be potentially significant.

As noted in Impact BIO-2 above, the proposed project will also include the construction of an 18-inch outfall that will drain into the west side of Devaney Creek and a 24-inch outfall that drains into the east side of Devaney Creek near the vicinity of Dublin Canyon Road. Specific design details for the outfalls have not yet been determined. While these outfalls are intended to be above OHWM, they will impact a small amount of riparian habitat in the range of 0.03 to 0.06 acre. The applicant will need to comply with all State and federal regulations related to construction work that will impact aquatic habitats occurring on the site. Under the currently proposed project, the applicant is likely to require a permit from the USACE and RWQCB for the filling of seasonal wetlands in the northern portion of the site. Through compliance with all State and federal regulations, along with implementation of MM BIO-3, which describes avoidance and minimization measure, project impacts to State and federally protected wetlands would be reduced to a less than significant level under CEQA.

Level of Significance Before Mitigation

Potentially significant impact.

Mitigation Measures

MM BIO-3 Mitigation Measures for Aquatic/Wetland Habitats:

Minimization

To minimize impacts, measures taken during construction activities shall include placing construction silt fencing around preserved aquatic features and riparian areas to ensure that construction activities do not inadvertently impact these areas.

As part of project buildout, all proposed lighting shall be designed to avoid light and glare impacts to preserved riparian corridors. Light sources shall not be visible from riparian areas and will not illuminate riparian areas or cause glare on the opposite side of the channels (e.g., to neighboring properties). Additionally, proposed development activities shall be designed and situated to avoid loss of trees within any riparian areas to the maximum extent practicable. Project construction must setback from the Tree Protection Zone (TPZ) of trees within the riparian area. A TPZ is defined as a circle whose center is within the base of an oak tree, the radius of which is equal to an oak tree's height or 10 feet, whichever is greater.

Compensation

A wetland/riparian Mitigation and Monitoring Plan (MMP) shall be prepared to compensate for a loss of approximately 0.25 acre of seasonal wetlands, 0.06 acre of a Roadside Drainage Ditch, and up to 0.06 acre of the loss of riparian habitat (see Table 3 of Appendix C1). The plan shall identify on-site preservation areas having a sufficient water budget (as determined by a Hydrologist) for the creation of seasonal wetland habitat that is of equal or greater quality to the seasonal wetland habitats being impacted at a minimum 2:1 creation:loss. If sufficient areas for the creation of wetland habitat cannot be identified on the preserve area, then the MMP shall include off-site mitigation, preferably within the same watershed, as an alternative strategy. At a minimum, the MMP shall:

- Define the location of all created wetlands.
- Provide evidence of a suitable water budget to support any created wetland habitats, as determined by a qualified Hydrologist.
- Identify species, size, number, and location of plants to be installed.
- Identify time of year for planting and any methods for supplemental watering during the establishment period.
- Identify the monitoring period for wetlands of no less than 5 years and no less than 10 years for riparian creation/enhancement.
- Identify measures that will be monitored, and define incremental and final success criteria that will be required for the wetland mitigation to be deemed a success.

- Identify adaptive management procedures that accommodate uncertainty that comes with wetland creation projects. These include (but are not limited to) measures to address colonization by invasive species, unexpected lack of water, excessive foraging of installed wetland plants by wildlife, etc.
- Define management and maintenance activities (weeding, repair of water delivery systems and browsing protection, etc.).
- Provide for surety in funding for MMP and for in-perpetuity preservation and management of created wetland habitats.

Level of Significance After Mitigation

Less than significant impact.

Fish and Wildlife Movement Corridors

Impact BIO-4:	**The proposed project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites.**

Impact Analysis

The proposed conservation area contains grassland, mixed oak woodland, and mixed riparian woodland. Because the conservation area supports a mosaic of habitats that can be used by many different types of species, the conservation area is likely to act as a movement corridor for more species than other areas supporting a single habitat type. The mosaic of habitats within the proposed conservation area would help to facilitate the movement of wildlife regionally through a known important wildlife linkage/corridor and likely acts as core habitat for multiple regional species. Expanding protected open space in the local vicinity of the project site in the form of the proposed conservation area would help to maintain a portion of this wildlife linkage/corridor in perpetuity.

However, the project as proposed will preserve approximately 104.6 acres of on-site land outside of the grading envelope which includes a mosaic of grassland, oak woodland, and riparian woodland/aquatic habitats, much of which is contiguous with other off-site open space to the north, west, and south of the project site, while impacting approximately 24 acres of primarily grassland habitat that is mostly concentrated in the eastern portion of the project site and closer to existing off-site development. After this area is developed, large areas of grassland habitats in surrounding lands will remain. Native wildlife currently using the creek corridors on the project site during movement and foraging activities will likely continue to use these corridors. This suggests that the proposed project, when considered by itself, will neither result in a wildlife population dropping below self-sustaining levels nor threaten to eliminate an animal community nor result in an impediment to movement between habitats on and off-site. The preservation of approximately 104.6 acres of habitats that include the most important contiguous habitat and movement corridors, would compensate for the loss of 23.89 acres of habitat impacted by development. Therefore, impacts to native wildlife due to the loss of habitat resulting from the proposed project are considered less than significant under CEQA.

Level of Significance

Less than significant impact.

Local Policies or Ordinances

Impact BIO-5: The proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Impact Analysis

The proposed project is located within the Gold Creek Watershed of CZ 8 of the EACCS study area for which a Programmatic Biological Opinion (BO) has been prepared. The Programmatic BO requires the proposed project to follow guidelines for the Congdon's tarplant—which is known to occur on the site—as well as for the CRLF, Alameda whipsnake, golden eagle, and American badger, as these latter species have the potential to occur on-site even if they have not been detected to date. With implementation of MM BIO-1a through MM BIO-1i, goals and objectives defined in Section 3.5 of the Conservation Strategy, including avoidance and minimization of potential impacts, would be achieved. The proposed project would be required to follow these measures as well as the additional measures in the Programmatic BO, which are included in Appendix E of the 2025 BE (Appendix C).

Additionally, approximately 104.6 acres of similar habitat to the development area would be preserved as a part of the proposed project and impacts to wetland and waters would be reduced to less than significant through MM BIO-3, in adherence to Policy 1 of the Pleasanton General Plan. Therefore, through the implementation of MM BIO-1a through MM BIO-3, the proposed project would adhere to policies and ordinances listed within the Pleasanton General Plan and Gold Creek Watershed of CZ 8 of the EACCS

Lastly, of the 208 trees surveyed, 95 of the trees met the City of Pleasanton's criteria for Heritage Trees. These Heritage Trees include species such as coast live oaks, California bays, bigleaf maples, blue gums, California black walnuts, valley oaks, apples, trees of heaven, black locust, California buckeye, California incense cedar, elderberry, Mexican fan palm, and willow. The Arborist recommends the preservation of 147 of the 208 trees surveyed, including 64 Heritage Trees. The Arborist has provided tree protection measures to ensure that retained trees will not be impacted by the proposed project. The final determination as to how many trees will be removed or retained will be made when the grading footprint is staked in the field.

The removal of trees, including Heritage Trees, because of the proposed project would constitute a significant impact. Construction activities that lead to the injury, decline, structural failure, or death of a tree proposed to be retained on the project site would also constitute a significant impact. Chapter 17.16 of the City of Pleasanton Municipal Code defines tree protection standards and requires a permit to remove Heritage Trees. However, with implementation of MM BIO-5, which detailed requirements for a tree protection plan, impacts to Heritage Trees would be reduced to less than significant under CEQA.

Level of Significance Before Mitigation

Potentially significant impact.

Mitigation Measures

MM BIO-5 Tree Preservation Plan

For trees to be retained, a tree preservation plan shall be prepared for the project identifying all protection and mitigation measures to be taken. These measures will remain in place for the duration of construction activities at the project site.

The following are recommendations for design and construction phases that will assist in successful tree preservation.

Design recommendations

a. Locate the trunk of all trees recommended for preservation that are located within 25 feet of the edge of grading and/or utility installation. Include trunk locations and tree tag numbers on all plans.
b. Establish a Tree Protection Zone (TPZ) around each tree to be preserved. For design purposes, the TPZ shall be 3 feet behind the edge of grading. No grading, excavation, construction or storage of materials shall occur within that zone.
c. Install protection around all trees to be preserved. No entry is permitted into a TPZ without permission of the Project Superintendent.
d. Use only herbicides safe for use around trees and labeled for that use, even below pavement.

Pre-construction and demolition treatments and recommendations:

1. The demolition contractor shall meet with the Consulting Arborist before beginning work to discuss work procedures and tree protection.
2. Trees to be preserved may require pruning to provide adequate clearance from construction activities. All pruning shall be performed by a licensed State of California contractor possessing the C61 classification license and the D49 specification. All pruning shall adhere to the latest editions of the American National Standards Institute Z133 and A300 standards.
3. Install tree protective fencing at the edge of the TPZ. No grading, construction, installation or other activity is permitted within this area.
4. Stake the edge of grading along the East Bay Regional Park District (EBRPD) access road in order to review impacts to trees.

Tree protection during construction:

1. Prior to beginning work, contractors working near trees to be preserved shall be required to meet with the Consulting Arborist at the project site to review all work procedures, access routes, storage areas, and tree protection measures.
2. Any grading, construction, demolition or other work that is expected to encounter tree roots shall be monitored by the Consulting Arborist.
3. If injury should occur to any tree during construction, it shall be evaluated as soon as possible by the Consulting Arborist so that appropriate treatments can be applied.

4. Fences have been erected to protect trees to be preserved. Fences shall remain until all site work has been completed. Fences may not be relocated or removed without permission of the Project Superintendent.
5. Construction trailers, traffic, and storage areas shall remain outside fenced areas at all times.
6. No materials, equipment, spoil, waste, or wash-out water may be deposited, stored, or parked within the TPZ (fenced area).
7. Any additional tree pruning needed for clearance during construction shall be performed by a qualified Arborist and not by construction personnel.
8. Any roots damaged during grading or construction shall be exposed to sound tissue and cut cleanly with a saw.

Tree Removal Permit:

The City of Pleasanton requires a permit to remove Heritage Trees. Implementation of the above Mitigation Measures would reduce loss of trees to a less than significant level.

Level of Significance After Mitigation

Less than significant impact.

Local, Regional, or State Habitat Conservation Plan

Impact BIO-6:	**The proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.**

Impact Analysis

No local Habitat Conservation Plans (HCPs) or Natural Community Conservation Plans (NCCPs) are known to be in effect for this project. The EACCS is not considered an HCP or NCCP because its purpose and operational framework differ from that of an HCP or NCCP. The EACCS is a voluntary, non-regulatory strategy designed to provide a regional approach to conservation and mitigation efforts in East Alameda County. It aims to streamline the environmental permitting process and provide guidance for conservation efforts, but it does not carry the same regulatory authority as an HCP or NCCP (see MM BIO-5).Therefore, the proposed project would not be conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or State HCP.

Level of Significance Before Mitigation

No Impact.

3.3.9 - Cumulative Impacts

Special-status Species

The geographic study area consists of a 1-mile radius around the project site, at which point undeveloped habitat meets urban development, limiting habitat opportunities for special-status

species. One cumulative project located at 11300 Dublin Canyon Road is within this geographic context and will be considered in the cumulative discussion.

All cumulative projects would be required to comply with applicable federal, State, and local laws, regulations, and policies and all applicable permitting requirements of the regulatory and oversight agencies intended to address potential impacts on biological resources. Cumulative projects would be required to adhere to standard pre-construction surveys and to implement, if necessary, avoidance procedures that would be required for projects with the potential to impact special-status wildlife species (see, e.g., MM BIO-1a through MM BIO-1i). Given the somewhat urbanized nature of the project vicinity and because cumulative development would be required to comply with the above requirements, applicable General Plan, and Municipal Code requirements (as described in Section 3.3.5, Regulatory Framework) cumulative biological impacts related to special-status species would be less than significant.

Similarly, the proposed project would implement applicant regulations and permitting and would implement MM BIO-1a through MM BIO-1i. As such, the proposed project's incremental contribution to the less than significant cumulative impacts would not be cumulatively considerable and cumulative impacts would be less than significant.

Sensitive Natural Communities or Riparian Habitat

As stated above, the geographic study area consists of a 1-mile radius around the project site, at which point undeveloped habitat meets urban development, limiting habitat opportunities for sensitive natural communities or riparian habitat. The 11300 Dublin Canyon Road Project is within this geographic context and will be considered in the cumulative discussion.

Development projects would likely be designed to address future growth problems, prevent urban sprawl, and minimize developmental impacts to sensitive natural communities. Moreover, cumulative projects within the cumulative geographic context would be required to comply with applicable federal, State, and local laws, regulations, and policies relating to riparian habitat or other sensitive natural communities. Therefore, cumulative impacts on sensitive natural communities or riparian habitat would be less than significant.

The proposed project would not impact any sensitive natural communities and would not significantly impact riparian habitat. MM BIO-3 contains Avoidance and Minimization Measures to decrease construction lighting and prevent construction activities from crossing into the riparian corridor and would be implemented to reduce already less than significant impacts. Therefore, the proposed project would not have a significantly cumulative contribution to less than significant cumulative impacts to riparian habitat or other sensitive natural communities.

Waters of the United States

The geographic study area consists of a 1-mile radius around the project site, at which point undeveloped habitat meets urban development, limiting habitat opportunities for waters of the United States. The 11300 Dublin Canyon Road Project is within this geographic context and will be considered in the cumulative discussion.

Within the potential cumulative project areas within the geographic context, development would not likely directly and significantly impact aquatic resources such as wetlands and jurisdictional features because of the highly urbanized nature of the geographic study area. Furthermore, cumulative projects with the potential to impact wetlands, other waters, or would be required to adhere to any applicable laws and regulations ,including, for example, consultation that may be required with the applicable regulatory agencies, the quantification of their potential impacts in a formal Jurisdictional Delineation, and implementation of any required mitigation pursuant to applicable laws and regulations. As such, there is a less than significant cumulative impact.

Additionally, the proposed project would not have a cumulatively considerable contribution to less than significant impacts related to wetlands or jurisdictional features through the implementation of MM BIO-3, which would reduce project-related impacts to a less than significant level. Therefore, the development of the proposed project would not have a cumulatively considerable contribution to this already less than significant cumulative impact on State or federally protected waters and wetlands.

Local Policies or Ordinances

The geographic study area is the range in which local policies or ordnances apply. Several cumulative projects are present within this geographic context. Within the geographic context discussed above, all development would be required to abide by applicable local policies and ordinances such as the City's Tree Protection Ordinance. Consistency with the General Plan and Municipal Code would also be required. Compulsory adherence to these regulations related to biological resources would ensure that impacts would be less than significant in this regard.

As discussed under Impact BIO-5, the proposed project would remove and mitigate for City-protected trees through the implementation of MM BIO-5 and would therefore be consistent with the General Plan and Zoning Ordinance designations. Therefore, the proposed project's contribution to the less than significant cumulative impact related to local policies and ordinances would not be cumulatively considerable.

Fish and Wildlife Movement Corridors

The geographic study area consists of a 1-mile radius around the project site, at which point undeveloped habitat meets urban development, limiting habitat opportunities for fish and wildlife movement corridors. The 11300 Dublin Canyon Road Project is within this geographic context and will be considered in the cumulative discussion.

Within the geographic context, development would not likely directly and significantly impact wildlife movement corridors or nursery sites due to the highly urbanized nature of the geographic study area. The cumulative project within the cumulative geographic context would be required to comply with applicable General Plan Policies, Municipal Code requirements, and other applicable regulations (as described in Section 3.3.5 Regulatory Framework) that protect wildlife movement corridors and nursey sites. With implementation of these policies, cumulative projects would result in less than significant cumulative impacts to wildlife movement corridors and nursery sites.

Nesting birds, including groups of species that are protected under federal and State law and are considered sensitive and protected under certain conditions (e.g., when nesting, breeding), are known to use the sites within the geographic context of the City of Pleasanton for nesting. Removal of mature trees that are critical for species reliant on mature trees may contribute to significant cumulative impacts on loss of suitable nesting habitat if similar trees nearby are also removed and not replaced in kind.

Potential project-related impacts on wildlife movement corridors are analyzed and discussed under Impact BIO-4 and are considered less than significant due to the 104.6 acres of preserved on-site land that mitigate for the impact of 23.89 acres of grassland habitat impacted by the proposed project. Therefore, the implementation of the proposed project would not cause or contribute to any significant cumulative impacts in this regard.

Habitat and Natural Community Conservation Plan Consistency

The geographic study area consists of a 1-mile radius around the project site. The 11300 Dublin Canyon Road Project is within this geographic context and will be considered in the cumulative discussion. The project site and potential cumulative project areas within the geographic context of the project site vicinity are not located within an HCP or NCCP. As such, there will be a less than significant cumulative impact to biological resources related to the cumulative project list and the proposed project's contribution to the less than significant cumulative impact would not be cumulatively considerable.

Level of Cumulative Significance Before Mitigation

Potentially significant impact.

Mitigation Measures

MM BIO-1a through MM BIO-5

Level of Cumulative Significance After Mitigation

Less than significant impact.

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3.4 - Cultural Resources and Tribal Cultural Resources

3.4.1 - Introduction

This section describes the existing cultural and tribal cultural resources setting and potential effects from project implementation on the site and its surrounding area. The descriptions and analysis on this section are based, in part, on an Archaeological Resources Assessment Report prepared by Basin Research Associates on April 30, 2018, as well as a Historic Architecture Evaluation Report prepared by Ward Hill in April 2018, which are included in the confidential Appendix D. Additional information was obtained from the Native American Heritage Commission (NAHC), an updated records search conducted at the Northwest Information Center (NWIC), the current inventories of the National Register of Historic Places (NRHP), the California Points of Historical Interest (CPHI) list, and the California Built Environment Resource Directory (BERD). The applicable regulatory framework is also discussed below.

During the Draft Environmental Impact Report (Draft EIR) scoping period, two comments were received related to cultural resources and tribal cultural resources.

- Summarizes Assembly Bill (AB) 52 and Senate Bill (SB) 18 requirements for cultural and Tribal cultural resources.
- Provides recommendations for Cultural Resources Assessments (CRAs).

3.4.2 - Environmental Setting

Overview

The term “cultural resources” encompasses historic resources, archaeological resources, tribal cultural resources, and burial sites and cemeteries, which are generally defined as follows:

- **Historic Resources:** Historic resources are associated with the recent past. In California, historic resources are typically associated with the Spanish, Mexican, and American periods in the State’s history and are generally less than 200 years old. Historic resources often take the form of buildings, structures, and other elements of the built environment.
- **Archaeological Resources:** Archaeology is the study of artifacts and material culture with the aim of understanding human activities and cultures in the past. Archaeological resources may be associated with pre-contact indigenous cultures as well as later historic periods.
- **Tribal Cultural Resources (TCRs):** TCRs include sites, features, places, or objects that are of cultural value to one or more California Native American tribes.
- **Burial Sites and Cemeteries:** Burial sites and cemeteries are formal or informal locations where human remains, usually associated with indigenous cultures, are interred.

More specifically, cultural resources may be understood as resources that have been formally recognized by a lead agency and/or are listed or determined eligible for listing on the California Register of Historic Resources (CRHR) (Public Resources Code [PRC] § 5024.1, Title 14 California Code

of Regulations [CCR] § 4852). It is notable that the fact that a resource is not yet identified as a historical resource or found eligible for the CRHR does not preclude a lead agency from determining that said resource is a historical resource pursuant to Public Resources Code Sections 5020.1(j) or 5024.1. Under the California Environmental Quality Act (CEQA), a substantial adverse change in the significance of a historical resource would constitute a significant effect on the environment.

Overall Cultural Resources Setting

Following is a brief overview of the relevant prehistory, ethnography, and historic background, providing context in which to understand the background and relevance of sites found in the general project vicinity. This section is not intended to be a comprehensive review of the current resources available; rather, it serves as a general overview. Unless otherwise stated, information contained in this section is drawn directly from the 2018 Archaeological Resources Assessment Report prepared by Basin Research Associates. Further details can be found in ethnographic studies, mission records, and major published sources in the Archaeological Resources Assessment Report.[1]

Environmental Setting

The San Francisco Bayshore and its variety of resources are located about 12 miles west of the proposed project, over present-day Walpert Ridge. A notable 1874 willow marsh/1867 lagoon, also mapped as *Tulare Lake or the Lagoon/Willows* later drained by a number of canals was located about two miles southeast of the proposed project, generally northwest of historic Pleasanton and east of I-680.

The project is located at the northern end of the Pleasanton Ridge with elevations ranging from 480 to 600 feet. A number of creeks are within the vicinity. Dublin Canyon Road shadows Dublin Creek along the northern boundary of the proposed project, while the southern periphery of the project parallels Devaney Canyon. The canyon and its intermittent creek run in a southwest to northeast direction across the property. Another unnamed forested canyon branches from Devaney Canyon on the west side of the property (Pleasanton Planning Commission [P/PC]2014 [Aerial 4–Lester and Shriner Sites]).

Kuchler maps the project vicinity as within mixed hardwood forest (#23). Soils in the project are classified as Clear Lake clay; Diablo clay; Los Gatos- Los Osos complex; Los Gatos loam part; and Millsholm silt loam.

Native American Background-Pre-contact

Native American occupation and use of the general area appears to extend over 5,000-7,000 years and may be longer. Springs and water courses and associated lakes and marshes were often a focus of prehistoric occupation in central California with Native American groups using a variety of ecological resources associated with flowing water, seasonal water sources and standing water.

The available archaeological information for the Bay Area suggests an increase in the prehistoric population over time with an increasing focus on permanent settlements with large populations in

[1] Basin Research Associates. 2018. Archaeological Resources Assessment Report-11021 and 11033 Dublin Canyon Road, Lester Project, Pleasanton, Unincorporated Alameda County City of Pleasanton Development Project P15-0027.

later periods. This change from hunter-collectors to an increased sedentary lifestyle is due to more efficient resource procurement but with a focus on staple food exploitation, the increased ability to store food at village locations, and the development of increasing complex social and political systems including long-distance trade networks.

Native American site types in the general area consist of habitation sites (e.g., villages and long-term camps including burials, temporary camps), non-habitation sites (e.g., workshops, hunting and butchering sites, etc.), bedrock mortars or other milling feature sites, rock art sites (e.g., petroglyph and pictographs), quarries, burial sites (including isolated burials), and trails.

Native American Background-Ethnographic

The Aboriginal inhabitants of southern Alameda County belonged to a Native American group known as the "Costanoan," derived from the Spanish word Costanos ("coast people" or "coastal dwellers") who occupied the central California coast as far east as the Diablo Range. Costanoan is part of the larger Penutian or Utian language stock spoken by other central California Indian groups known as the Wintun, Maidu, Miwok and Yokuts, and was subdivided into eight separate and mutually unintelligible languages. The descendants of these Native Americans now prefer to be called Ohlone.

In 1770 the Ohlone lived in approximately 50 separate and politically autonomous tribelets with each group having one or more permanent villages surrounded by a number of temporary camps. Physiographic features usually defined the territory of each group which generally supported a population of approximately 200 persons with a range of between 50-500 individuals.

The Pelnen Tribal group of the Chochenyo Tribelet of the Ohlone appear to have occupied the general project vicinity. The Pelnen appear to have occupied the western part of the Livermore Valley including present-day Pleasanton. Alice L. Hall places the probable village of Pelnen and Cavurun, southeast of the proposed project site (e.g., vicinity the Arroyo del Valle Creek [sic], each a short distance from the extensive willow marsh/Tulare Lake) and the probable village of Causen (just south of the junction of Arroyo de la Laguna with Alameda Creek). Cavurun appears to have been a subsidiary village of the Pelnens occupied by the Caburans, a small group of about six families.

No known Native American villages, trails, traditional use areas or contemporary use areas have been identified in or adjacent to the project. By the 1870s until about 1914 most of the Native Americans in the East Bay were living on the rancho of Juan Bernal about a mile west of Pleasanton at a place called “Alisal” (The Alders). A number of ethnographers interviewed Native Americans residing at Pleasanton in the late nineteenth and early twentieth centuries. Plains Miwok and Spanish were commonly spoken at the rancheria and most also spoke English. The 1906 special Indian census of 1906 lists 28 individuals at Pleasanton.

Regional Historic Background

The history of the San Francisco Bay Region can be divided into the Spanish Period (1769-1821), the Mexican Period (1822-1848), and the American Period (1848-onward). During the Spanish Period government policy in northwestern New Spain was directed at the founding of presidios (forts), missions, and pueblos (secular towns) with the land held by the Crown. Later Mexican Period policy stressed individual ownership of the land with grants of vast tracts of land to individuals.

Hispanic Era

Early Spanish expeditions in central California followed existing Native American trails. The period of initial historic exploration of the project area began in 1769. Between 1769 and 1776 a number of Spanish expeditions passed through Ohlone territory including those led by Portola, Fages, Fages and Crespi, Anza, Rivera, and Moraga. Even though the routes of the early explorers cannot be determined with total accuracy, none appear to have proceeded through vicinity of the proposed project site. Pedro Fages traveled through the Livermore valley in1770 passing through the Dublin-Pleasanton vicinity. The team noted “two villages close together south of [present-day] Dublin” and a large village of “perhaps over two hundred of both sexes.”

During the Spanish Period, the project site was within the lands of Mission San Jose which was established in 1797as the 14th of the 21 Missions founded in California. This mission, located in the southeast area of present-day Fremont, had jurisdiction over southern Alameda County. As one of seven missions in Ohlone territory, Mission San Jose had the greatest impact on the Native population living in the project area.

After Mexico seceded from Spain in 1822, land grants to private citizens increased significantly, especially following the 1833 act of the Mexican legislature ordering the secularization of the missions. Mexican Period land grants in the Amador/Livermore valley include Rancho San Ramon in 1835 to J.M. Amador; Rancho El Valle de San Jose in 1839 to Augustin and Antonio Pico, and Juan Pablo Bernal; Rancho Santa Rita in 1839 to Jose Pacheco; and Rancho Las Positas in 1839 to Robert Livermore and Jose Noriega (Halley 1876:492). The project site was located just west of the Rancho Santa Rita within ungranted lands with Rancho San Ramon (16,516 acres) located north of the Lester/Shriner property. None of the known Hispanic Era dwellings or other features (e.g., roads, corrals, etc.) were located in or adjacent to the project.

American Era

In the mid-19th century, most of the rancho and pueblo lands in California were subdivided as the result of population growth, the American takeover and the confirmation of property titles. The initial increase in population was associated with the Gold Rush (1848), followed later by the construction of the transcontinental railroad (1869). Still later, the development of the refrigerator railroad car (ca. 1880s) used for the transport of agricultural produce to distant markets had a major impact on population growth. The growth of the general study area was dependent on ranching/farming and transportation–first by water and roads and later, by rail and then by air.

In 1848, California became a United States territory as a result of the Treaty of Guadalupe Hidalgo which ended the war with Mexico. California was formally admitted as a State in 1850. The Gold Rush in the same year brought a massive influx of immigrants to California from all parts of the world. California's 1848 population of less than 14,000 (exclusive of Indians) increased to 224,000 in four years. As many of these new immigrants became discouraged with gold mining, they sought a more stable livelihood as farmers and ranchers. The new increase in population also created a domestic market for agricultural products that had never existed before. Once the owners of the Mexican ranches obtained clear title to their land, they typically sold off parcels to the newcomers who started farms and ranches.

In March 25, 1853, Alameda County was created from the western and southern sections of Contra Costa County and a portion of what was originally Santa Clara County south of Alameda Creek. Soon after Alameda County was formed, it was subdivided into six townships, the largest of which was Murray Township, covering the Amador/Livermore valley, over one-third of the county's area. Murray Township's isolation from San Francisco Bay delayed the development of agriculture in the area. The main transportation for agricultural products before the railroad was a series of landings along San Francisco Bay providing the East Bay with water access to outside markets. Consequently, although the ranches in what became Murray Township were subdivided in the 1850s, the American ranches in this area were still several thousand acres, and often the land was owned by non-residents and leased for grazing or cultivation of hay and grain. Between 1860 and 1890, wheat was by far California's most important grain crop. By the 1860s, wheat became the most important agricultural product in the western section of Murray Township.

A number of important roads ran through the study area linking Mission San Jose (within the City of Fremont) through Mission Pass to Dougherty's/Dublin, Mission San Jose to Stockton via Livermore, Hayward's to Stockton and the gold fields beyond. Livermore's Pass, Patterson Pass, and Corral Hollow Pass (formerly known as *Portezuela* [pass] de Buenos Ayres [good winds] were important links to the gold fields, as well as to localized mining resources in the Corral Hollow area. The 1857 Higley Official Map of the County of Alameda California (1857) shows a road between Oakland and Stockton located south of present-day Interstate 580 (I-580). By at least 1878, this American Period road generally conforms to the I-580 alignment that separates Dublin from Pleasanton. The Lincoln Highway, the precursor to I-580, was constructed in 1913 as one of the first transcontinental auto routes. It became U.S. Highway 50 (US-50) in 1925 and in the 1970s it was replaced by I-580. The northeast boundary of the proposed project, Dublin Canyon Road conforms to alignment of former US-50 through the Hayward Pass.

After the Central Pacific Railroad arrived in Murray Township in 1869, the economy changed over the next two decades from livestock ranching to the cultivation of grains, fruits and vegetables. The completion of the transcontinental railroad in 1869 opened a tremendous new market for California fruit and other agricultural products. In almost every area in the county served by adequate rail transportation, the large ranches were subdivided into smaller holdings for more specialized crops. A typical family farm of this era practicing mixed agriculture focused on wheat, barley and hay, in addition to producing garden vegetables and dairy products. The development of the canning industry, creating new methods of preserving and storing foods for delayed consumption, also stimulated the cultivation of fruit and vegetables in California.

The cities of Dublin and Pleasanton are the focal points of activity within the general study area. Interstate 580 and Dublin Canyon Road function as the divisor separating the proposed project from the two cities.

Local History

Dublin

The historic center of Dublin is about 0.9 mile northeast of the proposed project. The historic town or hamlet of Dublin in the Amador Valley functioned as an important central point between Castro

Valley to the west, Livermore to the east, Danville to the north, Pleasanton to the southeast, and Sunol to the south. The town, initially known as Amador after Jose Maria Amador, was later named Dougherty's. James Witt Dougherty of Tennessee acquired a large portion of Amador's Rancho San Ramon and operated a hotel for stage travelers (1852)."Dougherty's Station" warranted a post office as early as February 15, 1860 and the name was changed to "Dougherty" in 1896. "Dublin" was reportedly used by Dougherty for the southern area of the town because of the number of Irish settlers. The historic settlement area is located in the vicinity of Donlon Way and Dublin Way and includes Old St. Raymond's Church, the Pioneer Cemetery, Old Murray School, Green Store, and the Weightman Tract (formerly the site of the Green Mansion/Murray Homestead). The post office was changed to Dublin on January 18, 1896 and discontinued on February 29, 1908. The Dublin post office, a classified branch, was established in September 1963 [sic]. The railroad bypassed Dublin for Pleasanton and Livermore and was responsible in Dublin's decline as a commercial center. The city was incorporated in February 1982. It is currently a fast-developing residential and commercial center in the Tri-Valley area.

Pleasanton

The historic center of the town of Pleasanton is approximately 4.75 miles southeast of the proposed project. Pleasanton was surveyed in 1869 as a direct result of the arrival of the railroad. The precursor to Pleasanton was a small settlement named Alisal or Alsal (sycamores or cottonwood) located approximately two miles north/northeast of the project. It was founded in 1857 when Duerr & Nusbaumer opened a store in John Kottinger's house. Kottinger, who had immigrated from Austria in 1851, married into the Bernal family and operated a livestock ranch on a portion of the Bernal rancho. By 1864, in addition to the general store, Alisal also had a hotel and school. The center of town moved south to the train station when the railroad arrived. The original town plat near the station was on land owned by Kottinger and Joshua Neal, who had also married into the Bernal family and had been the majordomo for Robert Livermore's nearby Rancho Los Positas. Kottinger’s plat for Pleasanton was filed on September 20, 1869. By 1876, the town of Pleasanton had a couple of hotels, "some good stores," a post office, an express office, and grain warehouses. By the late 1870s, Pleasanton's population had grown to between 500 to 600, while Murray Township's population was about 4,000.

Pleasanton continued to be a small farm town until the mid-20th century. The town was incorporated in 1896, and Pleasanton Township was created in 1904 from the western section of Murray Township. Pleasanton's population of about 1,200 in the early 20th century did not increase significantly until after World War II. During the period before World War II, the population increased as a greater variety of agricultural products were produced in the area. Pleasanton became an important area for growing tomatoes, hops and sugar beets. In 1932, the packing houses in Pleasanton shipped grapes, tomatoes, cauliflower, squash and other vegetables; hay and grains were still important products in the area which had the only grain elevator in Alameda County. Dairying became increasingly important by the 1920s, and a number of the largest dairies in Alameda County were in the Pleasanton area. With a population of 3,000, Pleasanton was the smallest incorporated city in Alameda County in 1954. The opening of Parks Air Force Base and the Livermore atomic research laboratory during World War II began a period of growth in the Pleasanton area that transformed it from a small agricultural town into suburban residential/office community. New

residential subdivisions were built in the Pleasanton area starting in the 1950s as improvements to US-50 made commuting easier to Oakland or other cities of the East Bay. During the 1970s and 1980s, Pleasanton became one of the fastest growing areas in the Bay Area as many new subdivisions, two large business parks and a regional shopping center were built in the area. Development continues; Pleasanton, now a major suburban office/residential community at the southern end of the "680 Corridor," has a population of over 82,000.

The project includes a segment of Devaney Canyon, a canyon “named for Michael Devaney, a native of Ireland and a farmer and stock raiser, who settled near the mouth of the canyon in 1858.”

Summary Historic Map Review

Higley's 1857 *Official Map of the County of Alameda* shows “Dougherty & Glaskin” (e.g., the location of the future City of Dublin). In addition, a road is mapped through Hayward Pass (not labeled) onward to “R. Livermore” that conforms to the present-day I-580 corridor and a north–south road that conforms to the current Foothill Road are shown.

Thompson and West's 1878 *Official Historical Atlas Map of Alameda County* shows both roads and notable cluster of dwellings in/around “Dublin.” At the time, the northern Shriner parcel was owned by the “Est of M. Evans” and included a structure while the Lester property was owned by M. Devaney. His 240 acre property included the NE ¼ of Section 10 of T3S R1W and part of the NW ¼ of Section 11 with a structure within the far eastern part of the Lester property just south of Dublin Canyon Road on the south side of the intermittent creek within Devaney Canyon.

The 1880 Oakland Tribune's Map of Alameda County does not include the property owners of the project. Roads are shown through “Hayward Pass” (e.g., I-580/Dublin Canyon Road) and another north/south from Dublin (e.g., Foothill Road). The intermittent creek within Devaney Canyon is also mapped, but not labeled. The quality of the map is poor, but it suggests that the structure within the Lester property was still present.

Weber’s schematic 1914 Map of Alameda County, California provides minimal information for the study area. “Hayward Pass” west of the I-580/Dublin Canyon Road corridor and north/south Foothill Road from “Dublin” are present. The alignment of the “Western Pacific R.Y”/”Sou. Pac. R.R.” is shown through “Pleasanton” (with a few structures adjacent) southeast of Dublin as well as through the town/city grid of “Livermore.” The intermittent creek within Devaney Canyon is not shown.

The 1906 USGS Pleasanton topographic quadrangle map, shows “Haywards Pass” and “Dublin Doughtery P.O.,” the two major road corridors through the study area that conform to present-day I-580 and Foothill Road and an unpaved road on the south side of Devaney Creek. The Evans structure in the Shriner parcel and the possible structure in the far eastern part of the Lester property appear to be shown along with three others—one north of the creek and three south of the creek north of the unpaved road.

The 1943 US War Department Pleasanton topographic quadrangle map, relying on 1937 aerial photography, shows US-50 (labeled) through “Hayward Pass” and appears to show the same feature location as in the 1878 and the earlier USGS 1906 (surveyed in 1904) topographic quadrangle within

the Shriner property. In contrast, only one structure is present within the Lester property that appears to conform to the location of the single 1878 structure.

A 1949 aerial photograph shows a building within the largest Lester Parcel (APN 941-2006-2-6) north of the seasonal drainage within Devaney Canyon and adjacent to a small knoll with oak trees. This building appears to have been short lived and does not appear on the next available aerial photograph taken in 1958 (e.g., Cornerstone 2014: Appendix D).

The 1961 USGS Livermore and 1980 USGS Dublin topographic quadrangle maps show "Dublin Canyon" rather than Hayward or Haywards Pass. Two structures—one each in the Shriner and Lester property—and unpaved road along the south side of intermittent creek within Devaney Canyon are present.

The *Creek & Watershed Map of the Pleasanton & Dublin Area* shows no modification of the intermittent creek within Devaney Canyon, nor Dublin Creek located along the north side of Dublin Canyon Road just north of the northeast portion of the proposed project.

3.4.3 - Methodology

Archaeological Resources Assessment

Basin Research Associates (BASIN) conducted an archaeological resources assessment to determine whether significant archaeological resources could be present at the project site. For the assessment, BASIN obtained information from a records search of the California Historical Resources System, NWIC. Additionally, BASIN summarized the literature and archival information as well as the prehistoric and historic context, provided information about the NAHCs review of the *Sacred Lands Inventory* and NAHC consultation, and presented the results of an archaeological field inventory.

Historic Architecture Evaluation

A Historic Architecture Evaluation Report of two houses on the project site was conducted by Architectural Historian Ward Hill in April 2018. The two existing houses and associated structures at 11033 and 11021 Dublin Canyon Road were evaluated to determine whether these structures are architecturally or historically significant resources. The evaluation considered the structures' eligibility for the CRHR based on research and a field survey, including visual inspection of the structures, research of archived documents and historic records, and consultation with local historians.

Record Searches and Pedestrian Survey to Identify Existing Cultural Resources

Northwest Information Center

On May 3, 2023, an updated records search for the project site and a 0.5-mile radius beyond the project site was conducted at the NWIC located at Sonoma State University in Rohnert Park, California. The current inventories of the NRHP, the CRHR, the California Historical Landmarks (CHL) list, the CPHI list, and the BERD for the County of Alameda were also reviewed to determine the existence of previously documented local historical resources.

The results of the records search indicate that there are no recorded cultural resources within the project site. There is one pre-contact resource and two historic resources within a 0.5-mile radius of the project site (Table 3.4-1). In addition, there are two area-specific reports on file with the NWIC that include the project site. There are 17 area-specific reports on file with the NWIC within a 0.5-mile radius of the project site (Table 3.4-2).

Table 3.4-1: Cultural Resources Within a 0.5-mile Radius of the Project Site

Resource No.	Resource Description	Date Recorded
P-01-000063	Resource Name–De Avillo; CA-ALA-000043; Pre-contact; AP09 (Burials)–reported to have washed out in 1900; AP15 (Habitation debris)–FCR, pestles, mortars, shells	1950
P-01-010656	Resource Name–11711 Dublin Boulevard; Historic; HP08 (Industrial building); HP30 (Trees/vegetation)	2003
P-01-011948	Resource Name–10001 Dublin Canyon; Historic; HP04 (Ancillary building); HP33 (Farm/ranch)	2017
Source: Northwest Information Center (NWIC) Records Search.		

Table 3.4-2: Previous Investigations Within a 0.5-mile Radius of the Project Site

Resource No.	Report Title/Project Focus	Author	Date Recorded
S-000757	An Archaeological Survey of Two Excess Parcels, 04-ALA-580 22.7/25.0 04452-911	Charla M. Meacham	1977
S-000898	An Archaeological Reconnaissance of the Proposed Pipeline Routes and Reservoir Locations, Livermore-Amador Valley Water Management Agency, Alameda County, California	Edward M. Love, Miley Paul Holman, and David Chavez	1976
S-000914	An Archaeological Reconnaissance of the Proposed Pipeline Routing Changes Along the Dublin Canyon to the San Lorenzo Portion of the Livermore-Amador Valley Waste Treatment Project, Alameda County, California	Miley P. Holman and David Chavez	1976
S-008785	Cultural Resources Reconnaissance of Assessor's Parcel Number 941-1600-5-6, Near Dublin, Alameda County, California	R. Paul Hampson	1986
S-009716	Cultural Resources Reconnaissance of Assessor's Parcel Number 941-1580-1-4, Pleasanton, Alameda County, California	R. Paul Hampson	1988
S-011161	Technical Report–Cultural Resources, BART Dublin/Pleasanton Extension Project	Suzanne Baker, Laurence H. Shoup, and Anne Bloomfield	1989
S-012966	An archaeological field survey of proposed Interstate 580 improvements (letter report)	Stephen A. Dietz	1974

Resource No.	Report Title/Project Focus	Author	Date Recorded
S-017993	Cultural Resources Inventory Report for the Proposed Mojave Northward Expansion Project	Brian Hatoff, Barb Voss, Sharon Waechter, Stephen Wee, and Vance Bente	1995
S-19293	**An Archaeological Survey of Two Excess Parcels, 04-ALA-580 22.7/25.0 04452-911**	**Charla M. Meacham**	**1977**
S-019834	Cultural Resources Component for the Proposed LAVWMA Export Pipeline Expansion Project in Alameda County, California	Matthew R. Clark	1997
S-021868	Archaeological Survey of Route Segment on Parcel 941 (Kolb Property) near Stoneridge Mall, Pleasanton, CA (letter report)	Carrie D. Wills	1999
S-027909	Dublin Historic Resources Identification Project, Final Report	Page & Turnball, Inc.	2004
S-32780	**Cultural Resources Assessment Report, LAVWMA Export Pipeline and Facilities Study, Alameda County, California**	**William Self and Carrie D. Wills**	**1999**
S-035826	Historic Property Survey Report for the I-580 Westbound High Occupancy Vehicle Lane Project, Greenville Road to San Ramon/Foothill Roads, Alameda County, California: 4-Ala-580, P.M. 8.29/21.43, EA 29082K	Brian F. Byrd	2008
S-036958	Cultural Resources Investigation for Clearwire #CA-SFO0487A "Schaefer Ranch Water Tank," 10001 Dublin Canyon Road, Castro Valley, Alameda County, California 94552	Carolyn Losee	2010
S-040758	A Cultural Resources Study for a Proposed Recycled Water Expansion Project, Dublin, Alameda County, California	Virginia Hagensieker and Janine M. Loyd	2012
S-043279	Historic Property Survey Report, ALA-580 PM 0.0/8.1, 22.0/30.3; SJ-580 PM 13.5/15.4, EA 4G1900, EFIS 04-120000348; Archaeological Survey Report for the Freeway Performance Initiative	Kristina Montgomery	2013
S-047534	Section 106 Cultural Resources Investigation Report, City of Pleasanton Recycled Water Project (CWSRF) No. C-06- 8024-110	SMB Environmental, Inc.	2014
S-049423	Cultural Resources Investigations for Trileaf 634236/Crown Castle 830171 "NEW DUBLIN" 10001 Dublin Canyon Road, Castro Valley, Alameda County, California 94546 (letter report)	Carolyn Losee	2017

Source: Northwest Information Center (NWIC) Records Search. May 3, 2023.
Reports in **Bold**

Native American Heritage Commission Record Search

On May 4, 2023, FCS sent a letter to the NAHC in an effort to determine whether any sacred sites are listed on its Sacred Lands File for the project area. A response was received on May 25, 2023, indicating that the Sacred Lands File search produced negative results for Native American cultural resources in the project area. To ensure Native American knowledge and concerns over potential unrecorded TCRs that may be affected by the proposed project, the NAHC included a list of 12 Tribal representatives available for consultation. On May 30, 2023, FCS sent a letter containing project information and requesting any additional information on potential TCRs for the Cultural Resources Assessment. One response was received on Tuesday, June 6, 2023 from the Confederated Villages of Lisjan Nation, stating that the Tribe does not have further information, but that it is not always possible to know for certain whether there will be cultural resources or burials when there is ground disturbance. FCS has received no additional responses to date. Lead agency consultation pursuant to AB 52 and SB 18 is being managed by the City of Pleasanton; as of the date of this writing no tribes have requested consultation.

Cultural Resources Pedestrian Survey

Mr. Christopher Canzonieri, MA, and Mr. Stuart Guedon, MA, Archaeologists meeting the Standards of the Secretary of the Interior for archaeology, conducted a field survey/review of the proposed project site on March 20 and 23, 2018 to determine the presence of any surface and/or subsurface archaeological materials.

The field inventory focused on Assessor's Parcel Number (APN) 941-2006-2-6, APN 941-2500-03, and APN 941-2500-02 on March 20, 2018 and APN 941-2700-02 on March 23, 2018. All accessible areas were inventoried. Cattle grazing on the project site are covered in the first survey. In general, oak trees dominate the landscape especially in areas with water.

No evidence of prehistoric or historically significant archaeological resources and/or culturally affected soil was noted during the field survey. No isolated prehistoric artifacts were observed. Personal communication with knowledgeable local residents indicated that no prehistoric artifacts were known to have been found on the property. Several potentially historic structures including steel and wood water troughs, a pump house structure, and a concrete electrical vault were present on portions of the project site. Another portion of the project site had a collapsed possible livestock shelter, a feed bunker/hay shelf and an agricultural well/cistern present. However, there was no evidence that these structures were historically significant.

Historic Architecture Evaluation Report

The historic significance of the houses at 11021 and 11033 Dublin Canyon Road were evaluated relative to the four eligibility criteria under NRHP and CRHR. This included an evaluation of the property's potential significance in American history, architecture, archaeology, engineering, and culture as present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and are either:

A. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States (Criterion 1).

B. Associated with the lives of persons important to local, California, or national history (Criterion 2).

C. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values (Criterion 3).

D. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation (Criterion 4).

Building Description and NRHP/CRHR Evaluation

In order for a resource to be eligible for the CRHR, it must meet three criteria:

1. Be eligible under one of the four criteria of significance;
2. Retain historic integrity; and
3. Be 50 years old or older (except in rare cases where the resource meets a higher level or "exceptional" level of significance).

The two houses on the project site, located at 11021 and 11033 Dublin Canyon Road, are over 50 years old, and meet the age criterion. As such, a Historic Architecture Evaluation Report (Appendix D) was prepared by Ward Hill, Architectural Historian, in April 2018, in order to evaluate two houses and associated structures and landscape features. The following is a summary of the Report findings.

11021 Dublin Canyon Road

The house at 11021 Dublin Canyon Road is a single-family, single-story house. According to County Assessor records, the house at 11021 Dublin Canyon Road was constructed in 1918. This house was likely built by Joseph Fernandes who had owned the property from at least 1910. Manuel Terra, Sr. bought the property by the 1930s.

The house has a moderately pitched cross gable roof covered with asphalt shingles and patched with roofing paper. The house has exterior stucco walls. The roof has wide eaves and exposed raptors. The front and side gables also have prominent eave brackets. The prominent wide porch wraps around from the front (north) façade around to the west façade. The windows in the house are primarily wood-sash double-hung or casement.

Inside the small house has six rooms. The compact square plan with 904 square feet (about 30 by 30 feet) has no interior hallways. The rooms open directly one to another. The front door opens directly into the living room on the west side of the north façade. The living room has a coffered ceiling, wood wainscoting, a built-in break front with leaded glass doors and a fireplace faced with clinker brick (now painted). The doors and windows are framed with plain boards. Kitchen is south of and adjacent to the living room. The eastern half of the interior includes two small bedrooms (with bathroom in between) and a utility room. A kitchen door on the west leads to the side porch. A rear door from the utility room leads to the back yard.

The condition of the house appears to be poor and deteriorated. The porch is tilting to the west away from house. The ends of the roof rafters are rotted. The roof has been patched in several

locations. The sagging west slope of the roof suggests the building may have significant structural deficiencies.

11033 Dublin Canyon Road

The house at 11033 Dublin Canyon Road is a single-family, single-story house with an L-shaped plan. According to County Assessor records, the house at 11033 Dublin Canyon Road was built by the current owner/occupant in 1966.

The cross gable roof (covered with asphalt shingles) has plain shallow eaves. The exterior walls are covered with smooth stucco. The windows on the front façade are horizontal aluminum sash sliders. The front (north) façade has a prominent gable on the west with an adjacent recessed entrance porch. The gable has wide eaves with decorative brackets; the wall below the gable has two aluminum frame windows. The front façade has a brick base. One square post supports the porch roof projecting out from the main gable roof. The south façade has a sliding glass rear door.

Inside, the house has 1,850 square feet. The four bedrooms are on the west with the living areas—a kitchen, a dining room and a family room—on the east. The interior walls are largely covered wallboard. Part of the family room has natural wood paneling.

All structures were evaluated relative to the four eligibility criteria under NRHP and CRHR. This included an evaluation of the property's potential significance in American history, architecture, archaeology, engineering, and culture as present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association.

Criterion 1

The house at 11021 Dublin Canyon Road is associated with cultural patterns such as ranching or agricultural history of the Dublin/Pleasanton. However, the property is not eligible under CRHR criterion 1 because of the loss of all the original barns and outbuildings associated with its original use as a ranch. The historic integrity as a ranch has been compromised. The house at 11033 Dublin Canyon Road is a suburban Ranch house not associated with the property's use as a ranch.

In conclusion, the houses at 11021-11033 Dublin Canyon Road do not appear to be historically significant because of its association with local history, thus the houses are not significant under CRHR Criterion 1.

Criterion 2

Historic research did not identify any significant persons in local history who had lived in the houses at 11021 and 11033 Dublin Canyon Road, thus the houses do not appear to be significant under CRHR Criterion 2. The earliest occupants of the house at 11021 Dublin Canyon Road, Mary and Joseph Fernandes, a farmer, were not significant persons in local history. Beginning in circa 1940, Manuel Terra, Sr., followed by his son Manuel Terra, Jr., occupied 11021 Dublin Canyon Road. They were typical ranchers in the Dublin area and not persons of historic significance. The house at 11033 Dublin Canyon Road was built by the current occupant, Mabel Lester, in 1966.

Criterion 3

The house at 11021 Dublin Canyon Road is not a sufficiently exceptional or distinguished example of the Bungalow Style in the Dublin/Pleasanton area to be eligible under CRHR Criterion 3. Better examples of similar early 20th century houses that retain a higher level historic integrity still survive in the Dublin/Pleasanton area. A particularly fine local example of the Bungalow Style, the George Kolb house, was moved to the Dublin Heritage Park in 2011. The house at 11033 Diablo Canyon is a typical, undistinguished example of the Ranch House Style in the Dublin/Pleasanton area from the 1960s.

Criterion 4

Criterion 4 applies primarily to archaeological sites. The houses at 11021 and 11033 Dublin Canyon Road were built using standard wood frame construction techniques common during the 20th century. The buildings would not yield information important to history or prehistory, thus the houses are not eligible under Criterion 4.

In conclusion, the houses at 11021 and 11033 Dublin Canyon Road are not eligible for the CRHR because they are not significant under CRHR Criteria 1, 2, 3 or 4. The houses are also not contributing resources to a CRHR eligible historic district.

3.4.4 - Regulatory Framework

Federal

National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA), as amended, established the NRHP, which contains an inventory of the nation's significant prehistoric and historic properties. Under 36 Code of Federal Regulations 60, a property is recommended for possible inclusion on the NRHP if it is at least 50 years old, has integrity, and meets one of the following criteria:

- It is associated with significant events in history or broad patterns of events.
- It is associated with significant people in the past.
- It embodies the distinctive characteristics of an architectural type, period, or method of construction; or it is the work of a master or possesses high artistic value; or it represents a significant and distinguishable entity whose components may lack individual distinction.
- It has yielded, or may yield, information important in history or prehistory.

Certain types of properties are usually excluded from consideration for listing in the NRHP, but they can be considered if they meet special requirements in addition to meeting the criteria listed above. Such properties include religious sites, relocated properties, graves and cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years.

Archaeological Resources Protection Act

The Archaeological Resources Protection Act (ARPA) amended the Antiquities Act of 1906 (16 United States Code [USC] 431–433) and set a broad policy that archaeological resources are important to the nation and should be protected, and required special permits before the excavation or removal of archaeological resources from public or Native American lands. The purpose of the ARPA was to secure, for the present and future benefit of the American people, the protection of archaeological resources and sites that are on public lands and Native American lands and to foster increased cooperation and exchange of information between governmental authorities, the professional archaeological community, and private individuals having collections of archaeological resources and data that were obtained before October 31, 1979.

American Indian Religious Freedom Act

The American Indian Religious Freedom Act (AIRFA) established federal policy to protect and preserve the inherent rights of freedom for Native groups to believe, express, and exercise their traditional religions. These rights include but are not limited to access to sites, use and possession of sacred objects, and freedom to worship through ceremonials and traditional rites.

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (NAGPRA) of 1990 sets provisions for the intentional removal and inadvertent discovery of human remains and other cultural items from federal and Tribal lands. It clarifies the ownership of human remains and sets forth a process for repatriation of human remains and associated funerary objects and sacred religious objects to the Native American groups claiming to be lineal descendants or culturally affiliated with the remains or objects. It requires any federally funded institution housing Native American remains or artifacts to compile an inventory of all cultural items within the museum or with its agency and to provide a summary to any Native American Tribe claiming affiliation.

State

CEQA Guidelines Section 15064.5(a)—CEQA Definition of Historical Resources

CEQA Guidelines Section 15064.5(a), in Title 14 of the California Code of Regulations, defines a "historical resource" as:

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources.
2. A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of

California may be considered a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources.

4. The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code), or identified in a historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be a historical resource as defined in Public Resources Code Sections 5020.1(j) or 5024.1.

Therefore, under the CEQA Guidelines, even if a resource is not included on any local, State, or federal register, or identified in a qualifying historical resources survey, a lead agency may still determine that any resource is a historical resource for the purposes of CEQA if there is substantial evidence supporting such a determination. A lead agency must consider a resource to be historically significant if it finds that the resource meets the criteria for listing in the CRHR. Archaeological and historical sites are protected pursuant to a wide variety of State policies and regulations, as enumerated in the Public Resources Code. Cultural resources are recognized as nonrenewable resources and receive additional protection under the Public Resources Code and CEQA.

Public Resources Code Section 5024.1 and CEQA Guidelines Section15064.5(a)—Definition of a Historic Resource

Public Resources Code Section 5024.1 and CEQA Guidelines Section 15064.5(a), in Title 14 of the California Code of Regulations, define a "historical resource" as a resource that:

(1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

(2) Is associated with the lives of persons important in our past.

(3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.

(4) Has yielded, or may be likely to yield, information important in prehistory or history.

CEQA Guidelines Section 15064.5(a)(3)—California Register of Historical Resources Criteria

As defined by CEQA Guidelines, Section 15064.5(a)(3)(A-D), a resource shall be considered historically significant if the resource meets the criteria for listing on the CRHR. The CRHR and many local preservation ordinances have employed the criteria for eligibility to the NRHP as a model (see criteria described above under the description of the NHPA) since the NHPA provides the highest standard for evaluating the significance of historic resources. A resource that meets NRHP criteria is clearly significant. In addition, a resource that does not meet NRHP standards may still be considered historically significant at a local or State level.

California Public Resources Code Section 5024.1—California Register of Historic Resources

Section 5024.1 of the Public Resources Code states that the CRHR is a guide to be used by State and local agencies, private groups, and citizens to identify the State's historical resources and to indicate what properties are to be protected from substantial adverse change. Administration of the CRHR is to be overseen by the NAHC. Section 5024.1 indicates that the register shall include historical resources determined by the NAHC, according to adopted procedures, to be significant and to meet the criteria in subdivision (c).

CEQA Guidelines 15064.5(c)—Effects on Archaeological Resources

CEQA Guidelines state that a resource need not be listed on any register to be found historically significant. CEQA Guidelines direct lead agencies to evaluate archaeological sites to determine whether they meet the criteria for listing in the CRHR. If an archaeological site is a historical resource, in that it is listed or eligible for listing in the CRHR, potential adverse impacts to it must be considered. If an archaeological site is considered not to be a historical resource but meets the definition of a "unique archaeological resource" as defined in Public Resources Code Section 21083.2, then it would be treated in accordance with the provisions of that section.

CEQA Guidelines Section 15064.5(d)—Effects on Human Remains

Native American human remains and associated burial items may be significant to descendant communities and/or may be scientifically important for their informational value. They may be significant to descendant communities for patrimonial, cultural, lineage, and religious reasons. Human remains may also be important to the scientific community, such as prehistorians, epidemiologists, and physical anthropologists. The specific stake of some descendant groups in ancestral burials is a matter of law for some groups, such as Native Americans (CEQA Guidelines § 15064.5(d); PRC § 5097.98). CEQA and other State laws and regulations regarding Native American human remains provide the following procedural requirements to assist in avoiding potential adverse effects on human remains within the contexts of their value to both descendant communities and the scientific community.

- When an initial study identifies the existence or probable likelihood that a project would affect Native American human remains, the lead agency is to contact and work with the appropriate Native American representatives identified through the NAHC to develop an agreement for the treatment and disposal of the human remains and any associated burial items (CEQA Guidelines § 15064.5(d); PRC § 5097.98).
- If human remains are accidentally discovered, the County Coroner must be contacted. If the County Coroner determines that the human remains are Native American, the Coroner must contact the NAHC within 24 hours. The NAHC must identify the Most Likely Descendant (MLD) to provide for the opportunity to make recommendations for the treatment and disposal of the human remains and associated burial items (CEQA Guidelines § 15064.5(e)).
- If the NAHC is unable to identify an MLD, the MLD fails to make recommendations within 24 hours of notification, or the project applicant rejects the recommendations of the MLD, the Native American human remains and associated burial items must be reburied in a location not subject to future disturbance within the project site (CEQA Guidelines § 15064.5(e)).

- If potentially affected human remains or a burial site may have scientific significance, whether or not it has significance to Native Americans or other descendant communities, then under CEQA, the appropriate mitigation of effect may require the recovery of the scientific information of the remains/burial through identification, evaluation, data recovery, analysis, and interpretation (CEQA Guidelines § 15064.5(c)).

Health and Safety Code Section 7050.5 (Treatment of Human Remains)

Section 7050.5 of the California Health and Safety Code sets forth provisions related to the treatment of human remains. As the Code states, "every person who knowingly mutilates or disinters, wantonly disturbs, or willfully removes any human remains in or from any location other than a dedicated cemetery without authority of law is guilty of a misdemeanor" except under circumstances as provided in Section 5097.99 of the Public Resources Code. The regulations also provide guidelines for the treatment of human remains found in locations other than a dedicated cemetery, including responsibilities of the Coroner.

Public Resources Code Section 5097.98 (Discovery of Human Remains)

Section 5097.98 provides protocol for the discovery of human remains. It states that "when the commission receives notification of a discovery of Native American human remains from a County Coroner pursuant to subdivision (c) of Section 7050.5 of the Health and Safety Code, it shall immediately notify persons believed to be most likely descended from the deceased Native American." It also sets forth provisions for descendants' preferences for treatment of the human remains and what should be done if the commission is unable to identify a descendant.

California Public Resources Code Section 5097.91—Native American Heritage Commission

Section 5097.91 of the Public Resources Code established the NAHC, whose duties include the inventory of places of religious or social significance to Native Americans and the identification of known graves and cemeteries of Native Americans on private lands. Under Section 5097.91 of the Public Resources Code, a State policy of noninterference with the free expression or exercise of Native American religion was articulated along with a prohibition of severe or irreparable damage to Native American sanctified cemeteries, places of worship, religious or ceremonial sites, or sacred shrines located on public property. Section 5097.98 of the Public Resources Code specifies a protocol to be followed when the NAHC receives notification of a discovery of Native American human remains from a County Coroner. Section 5097.5 defines as a misdemeanor the unauthorized disturbance or removal of archaeological, historic, or paleontological resources located on public lands.

California Senate Bill 18—Protection of Tribal Cultural Places

SB 18 (California Government Code § 65352.3) incorporates the protection of California traditional Tribal cultural places into land use planning for cities, counties, and agencies by establishing responsibilities for local governments to contact, refer plans to, and consult with California Native American tribes as part of the adoption or amendment of any general or specific plan proposed on or after March 1, 2005. SB 18 requires public notice to be sent to tribes listed on the NAHC SB 18 Tribal Consultation list within the geographical areas affected by the proposed changes. Tribes must respond to a local government notice within 90 days (unless a shorter time frame has been agreed

upon by the Tribe), indicating whether or not they want to consult with the local government. Consultations are for the purpose of preserving or mitigating impacts to places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code that may be affected by the proposed adoption or amendment to a general or specific plan.

California Assembly Bill 52—Effects on Tribal Cultural Resources

Assembly Bill (AB) 52 (2014) provides that any public or private "project with an effect that may cause a substantial adverse change in the significance of a Tribal cultural resource is a project that may have a significant effect on the environment." TCRs include "[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the CRHR or included in a local register of historical resources." Under prior law, TCRs were typically addressed under the umbrella of "cultural resources," as discussed above. AB 52 formally added the category of "tribal cultural resources" to CEQA and extends the consultation and confidentiality requirements to all projects, rather than just projects subject to SB 18 as discussed above.

The parties must consult in good faith, and consultation is deemed concluded when either: (1) the parties agree to measures to mitigate or avoid a significant effect on a TCRs (if such a significant effect exists); or (2) when a party concludes that mutual agreement cannot be reached. Mitigation measures agreed upon during consultation must be recommended for inclusion in the environmental document. AB 52 also identifies mitigation measures that may be considered to avoid significant impacts if there is no agreement on appropriate mitigation. Recommended measures include:

- Preservation in place
- Protecting the cultural character and integrity of the resource
- Protecting the traditional use of the resource
- Protecting the confidentiality of the resource
- Permanent conservation easements with culturally appropriate management criteria

California Public Resources Code Section 21074—Effects on Tribal Cultural Resources

AB 52 amended the CEQA statute to identify an additional category of resource to be considered under CEQA, called "tribal cultural resources," and added Public Resource Code Section 21074, which defines "tribal cultural resources" as follows:

(a)"Tribal cultural resources" are either of the following:

(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are either of the following:

A) Included or determined to be eligible for inclusion in the CRHR.

B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

(2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for

the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American Tribe.

(b) A cultural landscape that meets the criteria of subdivision (a) is a Tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

(c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a Tribal cultural resource if it conforms with the criteria of subdivision (a).

Local

County of Alameda

Chapter 17.62 Historic Preservation Ordinance

17.62.020 Purpose: **The Purpose of the Ordinance shall be to:**

a) Identify, protect, and encourage the preservation of significant architectural, historic, prehistoric and cultural structures, sites, resources and properties in the County;

b) Ensure the preservation, protection, enhancement and perpetuation of historic structures, sites and other resources to the fullest extent feasible;

c) Encourage, through public or private action, the maintenance or rehabilitation of historic structures, sites and other resources;

d) Safeguard the County's historic resources, both public and private projects;

e) Encourage development that sensitively incorporates the retention, preservation and reuse of historic structures, sites and other resources;

f) Foster civic pride in the character and quality of the County's historic resources and in the accomplishments of its people through history;

g) Provide a mechanism, through surveys, nominations and other available means, to compile, update and maintain a register of historic resources within the County;

h) Protect and enhance the County's attraction to tourists and visitors;

i) Provide for consistency with State and federal preservation standards, criteria and practices;

j) Encourage new development that will be aesthetically compatible with historic resources;

k) Make available incentive opportunities to preserve Alameda County's historic resources.

17.62.060 Criteria and Requirements for Placement on the Alameda County Register: The criteria and requirements for placement on, or deletion from, the Alameda County Register as landmarks, historic preservation districts, contributing resources or structures of merit are as follows:

A. A nominated resource shall be added to the Alameda County Register as a landmark if the Board of Supervisors finds, after holding the hearings required by this chapter, that all of the requirements set forth below are satisfied:
   1. The nominated resource meets one or more of the following criteria:
      a. It is associated with events that have made a significant contribution to the broad patterns of the history of the County, the region, the State or the nation;
      b. It is associated with the lives of persons significant in the County's past;
      c. It embodies the distinctive characteristics of a type, period or method of construction;
      d. It represents the work of an important creative individual or master;
      e. It possesses high artistic values; or
      f. It has yielded, or may be likely to yield, information important in the prehistory or history of the County, the region, the State or the nation.
   2. The nominated resource has integrity of location, design, setting, materials, workmanship, feeling and association. Integrity shall be judged with reference to the particular criterion or criteria specified in subparagraph 1.
   3. The nominated resource has significance historically or architecturally, and its designation as a landmark is reasonable, appropriate and necessary to promote, protect and further the goals and purposes of this chapter.
   4. The nominated resource has been evaluated by a qualified historical resources consultant who meets one or more of the Secretary of the Interior's professional qualifications standards or who are certified by the Register of Professional Archaeologists, and the evaluator has submitted documents that provide evidence of the resources historical or architectural significance.

B. A geographic area nominated as a historic preservation district shall be added to the Alameda County Register as a historic preservation district if the Board of Supervisors finds, after holding the hearings required by this chapter, that all of the requirements set forth below are satisfied:
   1. The area is a geographically definable area;
   2. The area possesses either:
      a. A significant concentration or continuity of buildings unified by: a) past events; or b) aesthetically by plan or physical development; or
      b. The area is associated with an event, person, or period significant or important to County history
   3. The designation of the geographic area as a historic preservation district is reasonable, appropriate and necessary to protect, promote and further the goals and purposes of this chapter and is not inconsistent with other goals and policies of the County.
   4. A historic preservation district shall have integrity of location, design, setting, materials, workmanship, feeling and association.
   5. The collective historic value of the buildings and structures in a historic preservation district taken together is greater than the historic value of each individual building or structure.
   6. The application is accompanied by a form bearing the signatures of at least 51 percent of all property owners within the area of the proposed district.

7. The Board finds that the addition of the district to the Register does not in any manner interfere, eliminate or otherwise obviate the identification, qualification, designation and preservation requirements of the creation of Historic Preservation Districts pursuant to Chapter 20 of this Title.

C. A nominated resource shall be added to the Alameda County Register as a structure of merit if the Board of Supervisors finds, after holding the hearing(s) required by this chapter, that it satisfies one or more of the following criteria:
   1. It represents in its location an established and familiar visual feature of the neighborhood, community or County; or
   2. It materially benefits the historic, architectural or aesthetic character of the neighborhood or area; or
   3. It is an example of a type of building that once was common but is now rare in its neighborhood, community or area; or
   4. It is connected with a business or use which was once common but is now rare; or
   5. It contributes to an understanding of the contextual significance of a neighborhood, community or area.

D. A nominated resource shall be added to the Alameda County Register as a contributing resource if the Board of Supervisors finds, after holding the hearing(s) required by this chapter, that it satisfies one or more of the following criteria:
   1. The nominated resource is within a historic district;
   2. The nominated resource either embodies the significant features and characteristics of the historic district or adds to the historical associations, historical architectural qualities or archaeological values identified for the historic district;
   3. The nominated resource was present during the period of historical significance of the historic district and relates to the documented historical significance of the historic district;
   4. The nominated resource either possesses historic integrity or is capable of yielding important information about the period of historical significance of the historic district; and
   5. The nominated resource has important historic or architectural worth, and its designation as a contributing resource is reasonable, appropriate and necessary to protect, promote and further the goals and purposes of this chapter.

City of Pleasanton General Plan

Open Space and Conservation Element

The Open Space and Conservation Element, Chapter 7 of the General Plan, provides guidance, policies, and programs to conserve and manage natural resource and open space areas for the preservation, production, and enjoyment of natural and cultural resources and for the promotion of open space recreation, protection of public health and safety, and preservation of valuable wildlands.

Natural Resources

Goal 2 Preserve and enhance the natural resources of the Planning Area, including plant and wildlife habitats, heritage trees, scenic resources, and watercourses.

Policy 1 Preserve and enhance natural wildlife habitats and wildlife corridors.

Program 1.7 Minimize active recreation—sports, games, exercising, and fishing—within natural habitat areas. Permit passive recreation such as hiking, bicycling, horseback riding, nature and cultural resource study, photography, and picnicking.

Cultural and Historic Resources

Goal 4 Designate, preserve, and protect the archaeological and historic resources within the Pleasanton Planning Area.

Policy 5 Preserve and rehabilitate those cultural and historic resources which are significant to Pleasanton because of their age, appearance, or history.

Program 5.1 When reviewing applications for development projects, use information regarding known archaeological finds in the Planning Area to determine whether an archaeological study, construction monitoring or other mitigations are appropriate. Require that archaeological studies meet the requirements of the California Environmental Quality Act Guidelines Section 15064.5 in identifying mitigation measures if an archaeological site is encountered. Include provisions for the interpretation of cultural resources. Consult with the California Archaeological Inventory, Northwest Information Center, as necessary.

Program 5.2 Follow the recommendations contained within archaeological and historical architecture studies regarding rehabilitation or preservation of archaeologically or historically significant structures and sites.

Program 5.3 Continue to include a standard condition of project approval to require the cessation of all construction and grading activities within the vicinity of any discovered prehistoric or historic artifacts, or other indications of cultural resources, until any such find is evaluated by a qualified Professional Archaeologist, and appropriate mitigation is approved by the City.

Program 5.5 Encourage the use of educational workshops, exhibits, and teaching materials that celebrate the City's history, ancestral heritage, and Native American contributions, and encourage participation by Native American groups in developing such programs.

Community Character Element

The Community Character Element, Chapter 12 of the General Plan, identifies the physical and social aspects of Pleasanton's unique identity and establishes goals, policies, and programs to preserve and enhance those aspects which make the City special and distinct.

Goal 2 Preserve and enhance Downtown Pleasanton as a major focus of the community.

Policy 1 Encourage the retention, use, and enhancement of older buildings of historical importance and architectural heritage.

Program 1.1 Implement programs from the Conservation and Open Space Element related to historic preservation.

Public Facilities and Community Programs Element

Program 10.3 Disperse neighborhood and community parks throughout the City and combine them with areas of natural, scenic, or cultural resources.

Goal 8 Improve quality of life in the City by adding and maintaining appropriate new community amenities.

Policy 18 Provide additional public facilities to enhance the community.

3.4.5 - Thresholds of Significance

The Lead Agency utilizes the criteria in the CEQA Guidelines Appendix G Environmental Checklist to establish thresholds of significance to determine whether impacts to cultural resources and TCRs are significant environmental effects. As such, the City has determined that the proposed project would have a potential impact if it would:

a) Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

c) Disturb any human remains, including those interred outside of formal cemeteries.

d) Cause a substantial adverse change in the significance of a Tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).

e) Cause a substantial adverse change in the significance of a Tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.

3.4.6 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the development of the project and provides mitigation measures where appropriate.

Historic Resources

Impact CUL-1:	**The proposed project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.**

Impact Analysis

Construction

Historic resources in this context refer to the built environment, mainly buildings and structures over 50 years in age that may be eligible for inclusion on the CRHR or NRHP. The NWIC record search indicated that no previously recorded historic built environment resources are within the project site. However, there are two historic built environment resources recorded within a 0.5-mile radius of the project site.

The 2018 pedestrian survey determined that two single-family properties at 11021 and 11033 Dublin Canyon Road are over 45 years in age and are potentially historic resources. Thus, a Historic Architectural Evaluation Report evaluated these properties against the four eligibility criteria under NRHP and CRHR. As discussed in detail above, the properties were determined to be ineligible as historic resources under CEQA for the purposes of listing on the NRHP, CRHR, or any local listings. Therefore, construction of the proposed project would not have an adverse impact on historic era built environment resources.

Operation

No operational impacts would occur to a project's potential to cause a substantial adverse change in the significance of a historical resource.

Level of Significance Before Mitigation

No impact.

Mitigation Measures

None.

Archaeological Resources

Impact CUL-2:	**The proposed project could cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.**

Impact Analysis

Construction

The NWIC record search indicated that there is one pre-contact archaeological resource within a 0.5-mile radius of the project site, but none within the project site. The pedestrian survey of the project site did not encounter any indications of pre-contact archaeological resources.

Construction could result in the inadvertent exposure of buried archaeological resources. As such, Mitigation Measure (MM) CUL-2 includes provisions for the inadvertent discovery of archaeological resources, would reduce potential impacts to archaeological resources that may be discovered during project construction to a less than significant level.

Operation

Impacts related to a project's potential to cause a substantial adverse change in the significance of an archaeological resource are limited to construction impacts. No respective direct or indirect operational impacts related to archaeological resources would occur.

Level of Significance Before Mitigation

Potentially significant impact.

Mitigation Measures

MM CUL-2 The project proponent shall note on any plans that require ground-disturbing excavation that there is a potential for exposing buried cultural resources including prehistoric Native American burials.

The project proponent shall retain a Professional Archaeologist on an "on-call" basis during ground-disturbing construction for the project to review, identify and evaluate cultural resources that may be inadvertently exposed during construction. The Archaeologist shall review and evaluate any discoveries to determine whether they are historical resource(s) and/or unique archaeological resources under CEQA.

If any prehistoric or historic artifacts, or other indication of cultural resources are found once the project construction is underway, all work shall stop within 20-meters (66 feet) of the find. A qualified Archaeologist shall be consulted for an immediate evaluation of the find prior to resuming groundbreaking construction activities within 20 meters of the find. If the find is determined to be an important archaeological resource, the resource shall be either avoided, if feasible, or recovered consistent with the requirements of the California Environmental Quality Act (CEQA) Guidelines.

Level of Significance After Mitigation

Less than significant impact.

Human Remains

Impact CUL-3: The proposed project could disturb human remains, including those interred outside of formal cemeteries.

Impact Analysis

Construction

While no formal cemeteries are known to be in the project vicinity, there is one pre-contact resource that has been recorded within a 0.5-mile radius of the project site that is known to contain human

remains. While this resource does not intersect with the project site, the possibility exists that construction-related ground disturbance may uncover previously undiscovered human remains. This creates a potentially significant impact. In the event such a discovery is made, CEQA Guidelines Section 15064.5, Health and Safety Code Section 7050.5, and Public Resources Code Sections 5097.94 and Section 5097.98 must be followed. The implementation of the City's standard conditions of approval (COA CUL-3 below), which details inadvertent discovery procedures, would reduce potential impacts to previously undiscovered human remains to a less than significant level.

Operation

Impacts related to a project's potential to disturb human remains are limited to construction impacts. No direct or indirect operational impacts related to human remains would occur.

City of Pleasanton Standard Conditions of Approval

Consistent with General Plan Housing Element Program 5.3, the following standard condition of approval shall be implemented

COA CUL-3 Cultural Resources/Human Remains

If any prehistoric or historic artifacts, or other indication of cultural resources are found once the project construction is underway, all work shall stop within 20-meters (66 feet) of the find. A qualified Archaeologist shall be consulted for an immediate evaluation of the find prior to resuming groundbreaking construction activities within 20 meters of the find. If the find is determined to be an important archaeological resource, the resource shall be either avoided, if feasible, or recovered consistent with the requirements of the California Environmental Quality Act (CEQA) Guidelines. In the event that human remains are discovered during grading and construction of the project, work shall stop immediately. There shall be no disposition of such human remains, other than in accordance with the procedures and requirements set forth in California Health and Safety Code Section 7050.5, Public Resources Section 5097.98, and Title 14 California Code of Regulations Sect

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

Listed or Eligible Tribal Cultural Resources

Impact CUL-4: **The proposed project could cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).**

Construction

A review of the CRHR, local registers of historic resources, the NWIC records search results, and NAHC Sacred Lands File search results, and outreach to Tribal representatives failed to identify any previously listed TCRs that may be adversely affected by the proposed projects.

While no listed or eligible TCRs have been identified within the project site, subsurface construction activities always have the possibility of uncovering TCRs. This creates a potentially significant impact. However, with implementation of MM CUL-2 and COA CUL-3, impacts related to TCRs would be less than significant.

Operation

Impacts related to a project's potential to cause a substantial adverse change in the significance of a State-listed or eligible TCRs are limited to construction impacts. No operational impacts would occur.

Level of Significance Before Mitigation

Potentially significant impact.

Mitigation Measures

Implementation of MM CUL-2 and COA CUL-3.

Level of Significance After Mitigation

Less than significant impact.

Lead Agency Determined Tribal Cultural Resources

Impact CUL-5: **The proposed project could cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.**

Construction

Tribal consultation efforts conducted by the City of Pleasanton pursuant to AB 52 to identify additional significant TCRs meeting the criteria set forth in subdivision (c) of Public Resources Code

Section 5024.1 was initiated on September 18, 2025, and consultation letters were sent to each Tribe on the NAHC consultation list. To date, no responses requesting to consult have been received. As such, Tribal consultation efforts failed to identify additional significant TCRs in the project site. Should any undiscovered TCRs be encountered during project construction, implementation of MM CUL-2and COA CUL-3 would ensure that undiscovered TCRs are not adversely affected by project-related construction activities. As such, construction-related impacts would be less than significant with the implementation of mitigation.

Operation

Impacts related to a project's potential to cause a substantial adverse change in the significance of a State-listed or eligible TCRs are limited to construction impacts. No respective operational impacts would occur.

Level of Significance Before Mitigation

Potentially significant impact.

Mitigation Measures

Implementation of MM CUL-2 and COA CUL-3

Level of Significance After Mitigation

Less than significant impact.

3.4.7 - Cumulative Impacts

Cumulative Analysis

The geographic scope for the cumulative analysis is described further below for each type of resource. This analysis evaluates whether the impacts of the proposed project, together with the impacts of other cumulative development, could result in a cumulatively significant impact related to historical resources, archaeological resources, human remains, and TCRs. This analysis then considers whether the incremental contribution of the impacts associated with the implementation of the proposed project would be significant. Both conditions must apply for the proposed project's cumulative effects to rise to the level of significance. If there is no impact associated with respect to a particular CEQA threshold, discussion of cumulative impacts is not required. Accordingly, cumulative discussion is limited to the potential impacts as discussed below.

Historical Resources

The relevant geographic scope for potential cumulative impacts to historic, built environment resources is the land within the City's municipal boundaries. This is because the City provides the smallest geographic boundary of potential significance when a historic property is evaluated at the local, State, or federal level. The cumulative setting includes existing industrial, commercial and residential uses. Recorded historic resources were identified in the records search; however, the literature review and pedestrian survey of the project site yielded negative results, through the evaluation of the single-family properties, for historic resources. With respect to the cumulative projects, these cumulative projects have the potential to result in impacts to historic resources. The

Greek Orthodox Church Project includes a church that is more than 50 years old. However, potential cumulative impacts would be mitigated at an individual project level by adherence to applicable current State and federal laws and regulations, as well as other City and County laws, regulations, and mitigations, such as adherence to standard conditions of approval that require monitoring of construction sites in proximity to known resources (similar to as MM CUL-2a, e.g.). The combination of these efforts would reduce potential cumulative impacts related to historical resources to a less than significant level. Moreover, the proposed project would not have a considerably cumulative contribution to this already less than significant impact because there are no known historic resources that would be adversely impacted by the proposed project.

Based on the foregoing, the proposed project would not have a significant cumulative impact on any historic resources.

Archaeological Resources

The geographic scope of the cumulative archaeological resources analysis is the project vicinity. This is because archaeological resource impacts tend to be localized because the integrity of any given resource depends on what occurs in the immediate vicinity around that resource, such as disruption of soils, and the immediate vicinity provides the smallest geographic unit within which significant cumulative impacts spanning multiple projects may occur. Therefore, in addition to the project site itself, the area near the project site would be the area most affected by project activities (generally within a 0.5-mile radius). For the purposes of this analysis, the geographic scope is defined as the 0.5-mile NWIC records search radius. As discussed above, the geographic scope for this cumulative setting includes existing industrial, commercial and residential uses. One cumulative project shown on Exhibit 3-1, Cumulative Projects Map, is within the 0.5-mile geographic scope. Moreover, cumulative impacts to archaeological resources are limited to construction-related ground disturbances. There is one archaeological resource recorded within this geographic scope, but none are recorded within the project site; however, there is the possibility of previously unknown archaeological resources that could be damaged or destroyed during subsurface construction activities associated with cumulative projects. Accordingly, any such potential cumulative impacts would be mitigated at an individual project level by adherence to applicable local, State, and federal laws and regulations, as well as City and County laws, regulations, and the City's standard conditions of approval, as well as project-specific mitigation as discussed in Section 3.4.4 and Section 3.4.6. Accordingly, cumulative impacts would be less than significant. Additionally, the proposed project would not have a cumulatively considerable contribution to the less than significant cumulative impacts. As noted above, two reports address the project site specifically, indicating that it has previously been surveyed for cultural resources and none were identified on-site.

For the reasons noted above, the proposed project would not have a cumulatively considerable contribution to the less than significant cumulative impact on any known archaeological resources, and potentially significant impacts to any previously unknown resources that could be damaged or destroyed during project construction would be mitigated to less than significant by adherence to applicable laws and regulations and compliance with the identified mitigation measures (MM CUL-2 and COA CUL-3), which requires "on-call" monitoring during ground-disturbing construction, and inadvertent discovery procedures. Therefore, the proposed project would not have a cumulatively

considerable contribution on this already less than significant cumulative archaeological resources impact.

Human Remains

Potential cumulative impacts are limited to the construction phase. The geographic scope for the purpose of evaluating cumulative impacts relative to human remains is the project vicinity. This is because impacts related to human remains tend to be localized because the integrity of any given resource depends on what occurs in the immediate vicinity around that resource, such as disruption of soils, and the immediate vicinity provides the smallest geographic unit within which significant cumulative impacts spanning multiple projects may occur. Therefore, in addition to the project site itself, the area near the project site would be the area most affected by project activities (generally within a 0.5-mile radius). For the purposes of this analysis, the geographic scope is defined as the 0.5-mile NWIC records search radius. As discussed above, the geographic scope for this cumulative setting includes existing industrial, commercial and residential uses.

No known burial sites are located within the project site boundaries, however one pre-contact burial site is recorded within the geographic scope (See Table 3.4-1). Nonetheless, past, present and reasonably foreseeable construction activities may have the potential to encounter undiscovered human remains and/or formal cemeteries, these cumulative projects would be required to reduce impacts through compliance with applicable federal and State laws governing human remains and/or formal cemeteries. Additionally, the implementation of standard construction conditions of approval and best management practices, as well as project specific mitigation, if necessary, would ensure undiscovered human remains and/or formal cemeteries are not adversely affected by cumulative project-related construction activities, which would prevent the destruction or degradation of potentially significant cultural resources within the geographic scope. Therefore, cumulative impacts would be less than significant. Additionally, as the proposed project does not contain any known burial sites and would comply with all existing regulations in the event of an unanticipated discovery, it would not have a cumulatively considerable contribution to the less than significant cumulative impacts.

Tribal Cultural Resources

Significant impacts to TCRs may range from impacts to a resource meeting the CEQA definition of a significant historic resource, to impacts to resources identified through consultation between a lead agency and Native American Tribe. As such, the scope and range of potential cumulative impacts to TCRs are highly contingent on the nature of the resource and status of consultation. Cumulative impacts related to a project's potential to cause a substantial adverse change in the significance of a State-listed or eligible TCR are limited to construction impacts. In the absence of any known TCRs that will be impacted by the proposed project, the appropriate geographic scope for assessing potential cumulative impacts to TCRs is the project vicinity. This is because any undiscovered TCRs will likely be archaeological in nature, and the immediate project vicinity provides the smallest geographic unit within which significant cumulative impacts spanning multiple projects may occur. For this analysis, the immediate vicinity is defined as the 0.5-mile NWIC records search radius. There is one cumulative project within the geographic scope.

Future development within the cumulative geographic scope could have significant cumulative impacts on known or previously unidentified cultural resources and TCRs. However, development within the cumulative geographic context would be required to comply with federal, State, and local laws and policies that protect cultural resources and TCRs, including the provisions of Senate Bill (SB) 18 and Assembly Bill (AB) 52, Section 15064.5 of the CEQA Guidelines, Section 7050.5 of the California Health and Safety Code, and Sections 5024.1 and 5097 of the Public Resources Code which would sufficiently reduce impacts. Compliance with these policies may also require development projects to prepare site-specific project-level analyses to fulfill CEQA requirements, which also would include additional consultation that could lead to the identification of potential site-specific cultural resources and TCRs. Accordingly, cumulative development would be required to comply with long-term planning documents, and regulatory agency policies (including, but not limited to, standard conditions of approval, evaluation requirements and inadvertent discovery procedures) that reduce impacts to potential cultural resources and TCRs. Accordingly potential cumulative impacts to cultural resources and TCRs would be reduced to the maximum extent practicable; however, cumulative impacts would remain potentially significant.

With adherence to all applicable regulations, including the City's standard conditions of approval and implementation of the mitigation proposed herein, the proposed project's incremental contribution to potential cumulative impacts would not be significant. MM CUL-2a would require that specific procedures be followed in the case of inadvertent discovery of historic or pre-contact resources.

Level of Cumulative Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

3.5 - Energy

3.5.1 - Introduction

This section describes the existing energy setting in the proposed project area as well as the relevant regulatory framework. Energy consumption focuses on traditional fossil fuels as well as replacement with renewable sources and overlaps considerably with regulations and policies designed to reduce greenhouse gas (GHG) emissions. This section focuses primarily on energy regulations and policies, with references to GHG and air quality regulations that also reduce energy consumption.

No public comments were received during the Environmental Impact Report (EIR) scoping period related to energy.

3.5.2 - Environmental Setting

The existing setting focuses on Alameda County and City level energy consumption and factors related to the use and availability of traditional fossil fuel and alternative, renewable energy sources.

Energy Usage Sectors

Energy use in an area is distributed across several sectors: industrial, residential and commercial energy and transportation.

- **Transportation Sector:** This is a significant consumer of energy, primarily in the form of gasoline and diesel for vehicles.
- **Industrial sector:** The industrial sector includes consumption from construction, in addition to manufacturing, agriculture and mining.
- **Residential and commercial sectors:** The residential sector covers energy used in homes, businesses, offices, stores, and other commercial establishments for heating, cooling, lighting, and appliances.

Transportation Sector

Alameda County sold an estimated 468 million gallons of gasoline and 55 million gallons of diesel in 2023.[1]

A variety of alternative fuels are used to reduce petroleum-based fuel demand. The use of these fuels is encouraged through various Statewide regulations and plans, such as the Low Carbon Fuel Standard (LCFS) and Senate Bill (SB) 32. Conventional gasoline and diesel may be replaced, depending on the capability of the vehicle, with transportation fuels including hydrogen, biodiesel,

[1] California Energy Commission (CEC). 2024. 2023 Annual Retail Fuel Outlet Report Results CEC-A15 Results and Analysis, Website: https://www.energy.ca.gov/media/3874. Accessed February 27, 2025.

and electricity. In 2023, the State had 597 renewable diesel refueling stations, 57 private hydrogen stations and seven retail hydrogen stations.[2]

Electricity can be used to power electric and Plug-in Hybrid-Electric Vehicles (PHEVs) directly from the power grid. Electricity used to power vehicles is generally provided by the electricity grid and stored in the vehicles' batteries. Fuel cells are being explored to use electricity generated onboard the vehicle to power electric motors. As of August 2024, California had a reported 153,034 public and shared private electric vehicle chargers; Santa Clara County had a reported 23,665 chargers, the second highest in the State, after Los Angeles County. This includes 971 Public DC fast chargers, 6,088 Public Level 2 and 16,145 Shared Private DC fast chargers.[3]

Construction Sector

Estimates of construction fuel are not available as a subcategory of industrial usage; however, construction fuel is known to be a significant contributor to industrial fuel consumption. The construction industry is a major user of diesel fuel as it is utilized almost exclusively in off-road construction equipment. Diesel is the fuel of choice because it has 12 percent more energy per gallon than gasoline and has fuel properties that prolong engine life, making it ideal for heavy-duty vehicle applications. Biodiesel was introduced into California in 2000 and Renewable Diesel in 2012. Biodiesel is predominantly made from soybean and recycled oils into a unique diesel fuel (it can be blended into transportation fuels but is not a substitute for diesel fuel). Renewable Diesel is predominantly made from animal waste oils and the finished fuel is nearly identical to petroleum-based diesel.[4] The chemical and structural properties of renewable diesel are similar to petroleum-derived (conventional) diesel and can be used as a direct substitute for conventional diesel (up to 100 percent or R100). Blends of renewable diesel and conventional diesel are labeled with an R followed by the percentage (by volume) of the renewable diesel content. [5]

California consumed nearly 40 million barrels of renewable diesel in 2022[6], compared to 1 million barrels in 2011 and 28 million barrels in 2021. This is largely a result of the LCFS which went into effect in 2011.[7] This represents a significant shift away from traditional diesel with clean fuels replacing over 50 percent of the diesel used in the State in the first quarter of 2023.[8]

Residential and Commercial Sector

Electricity and natural gas are distributed through the various electric load-serving entities (LSEs) in California. These entities include investor-owned utilities (IOUs), publicly owned LSEs, rural electric

[2] United States Department of Energy (DOE). 2024. Alternative Fueling Station Counts by State. Website: https://afdc.energy.gov/stations/states. Accessed March 6, 2025.

[3] California Energy Commission (CEC). 2024. Electric Vehicle Chargers in California. Website: https://www.energy.ca.gov/data-reports/energy-almanac/zero-emission-vehicle-and-infrastructure-statistics-collection/electric. Accessed March 6, 2025.

[4] California Energy Commission (CEC). 2024. Diesel Fuel Data, Facts, and Statistics. Website: https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/diesel-fuel-data-facts-and-statistics. Accessed March 6, 2025.

[5] California Air Resources Board (ARB). 2024. Fact Sheet: Renewable Diesel Fuel Requirements. Website: https://ww2.arb.ca.gov/resources/fact-sheets/fact-sheet-renewable-diesel-fuel-requirements. Accessed March 6, 2025.

[6] United States Energy Information Administration (EIA). 2024. State Profiles and Energy Estimates. Website:https://www.eia.gov/state/seds/sep_fuel/html/pdf/fuel_use_rd.pdf Accessed March 6, 2025.

[7] United States Energy Information Administration (EIA). 2023. Almost all U.S. renewable diesel is consumed in California; most is not made there. Website: https://www.eia.gov/todayinenergy/detail.php?id=57180#, July 20. Accessed March 6, 2025.

[8] California Air Resources Board (ARB). 2023. Press Release 23-24: Low Carbon Fuel Standard drives shift away from petroleum. Website: https://ww2.arb.ca.gov/news/first-time-50-california-diesel-fuel-replaced-clean-fuels. August 23. Accessed March 6, 2025.

cooperatives, community choice aggregators, and electric service providers. These providers are often subject to State-level regulations and standards, including Renewable Portfolio Standard (RPS).

The RPS consists of policies (applicable to the energy /utility provider) designed to increase the use of renewable energy sources for electricity generation. California's RPS, established by SB 350 and subsequently SB 100, require 60 percent of electricity to come from renewable sources by 2030 and 100 percent from zero-carbon sources by 2045.

The renewable content of the produced electricity is based on the energy mix, or the combination of different energy sources used to meet energy needs in a particular region. It includes both renewable and nonrenewable sources. For example, a typical energy mix might include coal, natural gas, nuclear, hydroelectric, wind, and solar power. For example, a typical energy mix might include coal, natural gas, nuclear, hydroelectric, wind, and solar power.

Under the Power Source Disclosure Program, retail electricity providers are required to annually disclose to their retail consumers the mix of sources used to provide electricity service during the previous calendar year. In those instances where a retail supplier offers consumers more than one electricity portfolio, the retail supplier is to provide information specific to each electricity portfolio offered. This information is provided to consumers in the form of Power Content Labels.[9]

Electricity

In 2022, Alameda County's commercial and residential sectors utilized a total of 10,395 million kWh (GWh) divided into nonresidential usage of 7,199 GWhr and residential usage of 3,195 GWhr.[10]

Natural Gas

In 2022, Alameda County's natural gas usage was 377 total millions of therms (167 million therms for nonresidential usage and 210 million therms for residential).[11] Pacific Gas and Electric Company (PG&E) supplies natural gas in Alameda County. The site is currently served by natural gas via pipeline. However, the proposed project will not utilize natural gas or have natural gas lines to the buildings.

3.5.3 - Regulatory Framework

Federal

Federal energy regulations were first introduced in 1975 with the energy Policy and Conservation Act of 1975 in response to the 1973-1974 Arab Oil Embargo to improve the average fuel economy of cars and light trucks in the US. Other subsequent federal rules included the Energy Policy Act of 2005 (which introduced numerous energy efficiency standards for appliances, building off the existing

[9] California Energy Commission (CEC).2022. Power Content Labels. Website: https://www.energy.ca.gov/programs-and-topics/programs/power-source-disclosure-program/power-content-label. Accessed November 12, 2024.

[10] California Energy Commission (CEC). 2024. Energy Consumption Database, Electricity Consumption by County. Website: https://ecdms.energy.ca.gov/elecbycounty.aspx. Accessed February 27, 2025.

[11] California Energy Commission (CEC). 2024. Energy Consumption Database, Gas Consumption by County. Website: https://ecdms.energy.ca.gov/gasbycounty.aspx. Accessed October 11, 2024.

Energy Star Program) and The Energy Independence and Security Act of 2007 (which strengthened the vehicular fuel economy standards).

These regulations set important groundwork and foundation for subsequently promulgated California regulations.

State

Because federal regulations generally preempt State and local regulations, they set the foundation for subsequent State regulations to build upon. The following addresses State regulations related to transportation fuel efficiency, and regulations related to commercial and residential energy usage related to building envelope and appliance usage.

Transportation Sector

California adheres to the federal Corporate Average Fuel Economy (CAFE) standards, but also has several other State programs that influence emissions and fuel efficiency. These regulations include the following:

- Pavley Regulations and Fuel Efficiency Standards (AB 1493)
- Low Emission Standards (LEV Program)
- Zero-Emission Vehicle (ZEV Program)
- Advanced Clean Cars Program
- CA Phase 2 GHG Trailer Certification
- Truck and Bus Regulations
- Heavy-Duty Diesel GHG Certification Program
- Heavy-Duty Inspection and Maintenance (I&M) Regulation
- Clean Miles Standard

These GHG or air quality regulations aim to reduce emissions of criteria pollutants, air toxics, and GHGs, resulting in decreased energy consumption. However, they are not energy regulations or policies per se. While these regulations increase energy efficiency and consumption from vehicles, they typically apply to vehicle/engine manufacturers or vehicle maintenance and operation rather than directly to land use developers. Developers can influence on-site operational factors that affect energy consumption by enforcing air quality regulations and measures that influence emissions from vehicles, such as limits on idling of commercial motor vehicles and construction equipment.

The California Code of Regulations Title 13, Section 2485, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling, prohibits diesel-fueled commercial vehicles from idling for more than five minutes at any given location. Compliance with this measure results in energy savings through reduced fuel consumption from unnecessary idling.

The Sustainable Communities and Climate Protection Act of 2008 (SB 375) requires land use projects to meet target reductions of Vehicle Miles Traveled (VMT) to reduce GHG emissions. Because VMT is directly related to fuel consumption, this regulation also serves to reduce energy consumption related to passenger vehicle travel.

Construction Sector

Land use development projects consume fuel during construction operations. Because of energy and efficiency requirements, off-road diesel equipment dominates the industry. Provisions in California's In-Use Off-Road Diesel Fleets regulation under California Code of Regulations Title 13 not only provide protection from air pollution but also promote the use of newer, well-tuned, and maintained equipment, and provide regulatory limits on unnecessary idling. These measures minimize toxic diesel exhaust and result in energy efficiency and avoidance of wasteful energy use.

Residential and Commercial Sector (Buildings and Appliance Energy)

California Code of Regulations Title 24

Part 6 (Energy Efficiency Standards for Residential and Nonresidential Buildings)

California Code of Regulations Title 24 Part 6 (California's Energy Efficiency Standards for Residential and Nonresidential Buildings) was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy-efficient technologies and methods. Energy-efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The 2022 Building Energy Efficiency Standards went into effect on January 1, 2023.[12]

This update to the building code provides crucial steps in the State's progress toward 100 percent clean carbon neutrality by midcentury. The 2022 Energy Code builds on California's technology innovations, encouraging energy-efficient approaches to encourage building decarbonization, emphasizing in particular heat pumps for space heating and water heating. This set of Energy Codes extends the benefits of photovoltaic and battery storage systems and other demand flexible technology to work in combination with heat pumps to enable California buildings to be responsive to climate change. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Energy Code. The Energy Code includes measures that will reduce energy use in single-family, multi-family, and nonresidential buildings. These measures will:

- Affect newly constructed buildings by adding new prescriptive and performance standards for electric heat pumps for space conditioning and water heating, as appropriate for the various climate zones in California.
- Require photovoltaic (PV) and battery storage systems for newly constructed multi-family and selected nonresidential buildings.
- Electric-readiness is a new mandatory requirement for dwelling unit gas space heating, water heating, cooking, and laundry. Common use areas are exempt from the electric-ready requirement, with the exception of common use area clothes dryers.
- Update efficiency measures for lighting, building envelope, heating, ventilation, and air conditioning (HVAC); and

[12] The 2025 Building Energy Efficiency Standards will go into effect January 1, 2026.

- Make improvements to reduce the energy loads of certain equipment covered by (i.e., subject to the requirements of) the Energy Code that perform a commercial process that is not related to the occupant needs in the building (such as refrigeration equipment in refrigerated warehouses, or air conditioning for computer equipment in data processing centers).

California Code of Regulations Title 20 (Appliance Efficiency Regulations)

Sets standards for the energy efficiency of appliances sold or offered for sale in California, covering a wide range of appliances. Title 20 ensures that individual appliances meet specific energy efficiency standards, complementing Title 24's focus on overall building energy efficiency.

California Code of Regulations Title 24 Part 11 (California Green Building Standards Code)

California Code of Regulations Title 24, Part 11 (commonly referred to as the CALGreen Code) provides for voluntary energy efficiency provisions designed to support local jurisdictions and other entities aiming to exceed the mandatory energy efficiency requirements set by the Energy Code. These provisions apply to newly constructed buildings as well as additions and alterations to existing buildings. These voluntary measures focus on enhancing resource efficiency, improving building energy system performance, and aligning with broader environmental and public health goals, such as decarbonizing California's economy. They complement the mandatory provisions by offering additional strategies for energy conservation and efficiency.

Renewable Portfolio Standard

Established by Senate Bill 350 and Senate Bill 100, the RPS mandates that 60 percent of California's electricity come from renewable sources by 2030 and 100 percent from zero-carbon sources by 2045. Developers can support this by integrating renewable energy systems, such as solar panels, into their projects. This not only helps meet State energy goals but also enhances the sustainability and marketability of new developments.

California Energy Commission 2023 Integrated Energy Policy Report

The Integrated Energy Policy Report (IEPR) is prepared by the CEC biennially (every two years), as mandated by Senate Bill 1389. This report provides a comprehensive overview of the State's major energy trends and issues, covering sectors like electricity, natural gas, and transportation fuels. The 2023 report highlights the implementation of California's innovative policies and the role they have played in establishing a clean energy economy, as well as provides more detail on several key energy policies, including decarbonizing buildings, increasing energy efficiency savings, and integrating more renewable energy into the electricity system.

Regional

The Bay Area Air Quality Management District (BAAQMD) implements various policies and regulations to enhance energy efficiency and promote clean energy usage in the region. The 2017 Clean Air Plan, titled "Spare the Air, Cool the Climate," outlines several strategies to achieve these goals:

Building Electrification and Efficiency Regulations

Regulation 9, Rule 4

Targets nitrogen oxides (NOx) emissions from residential central furnaces, requiring new appliances to meet zero-NOx standards. This promotes the transition to electric heat pumps, which are more energy-efficient and reduce reliance on natural gas.

Regulation 9, Rule 6

Focuses on NOx emissions from natural gas-fired boilers and water heaters, setting stringent emission standards for these appliances. Compliance with these standards is mandatory for new installations.

Electrification Requirements

The BAAQMD has adopted rules to promote the electrification of buildings, which will take effect in 2027 for water heaters and 2029 for space heaters. These rules mandate the replacement of natural gas appliances with highly efficient electric heat pumps.

Clean Air Plan Control Measures

The Clean Air Plan includes specific control measures aimed at reducing energy consumption and promoting clean energy:

BL1 Green Building Standards: Encourages the adoption of green building standards that exceed the mandatory requirements, promoting energy-efficient building designs and technologies.

BL2 Decarbonizing Buildings: Focuses on reducing greenhouse gas emissions from buildings by promoting electrification and the use of renewable energy sources.

BL4 Energy Efficiency: Implements programs to improve energy efficiency in existing buildings through retrofits and upgrades.

Local

City of Pleasanton General Plan

The Public Facilities and Community Programs Element of the City of Pleasanton General Plan includes goals to manage solid waste in ways that are environmentally acceptable by promoting waste diversion and the use of recycled products.

The Air Quality and Climate Change Element of the General Plan, as well as the Energy Element, address GHG emissions and identify policies to protect and improve this resource focused on energy conservation, alternative transportation, water conservation, and preservation of the City's urban forest and Urban Growth Boundary.

City of Pleasanton General Plan

The City of Pleasanton's Council adopted an updated Climate Action Plan (CAP 2.0) in February 2022, with minor revisions in February 2023. The CAP 2.0 updates the City's original CAP, which was adopted in 2012. It outlines local actions to reduce GHG emissions, enhance environmental

sustainability and prepare for climate change. Since the City's original CAP was adopted, a multitude of strategies to monitor and address climate change have emerged. Further, the State has adopted legislation establishing GHG emission reduction targets. Assembly Bill 32, Executive Order B-55-18 and Executive Order S-3-05, have established Statewide GHG emission reduction targets of 40 percent below 1990 emission levels by 2030, carbon neutrality by 2045 and GHG emission reduction targets of 80 percent below 1990 emission levels by 2050. CAP 2.0's actions will allow the City to do its part to meet these targets. The City's CAP 2.0 is considered a qualified GHG reduction strategy pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15183.5(b).

3.5.4 - Methodology

The approach to analysis for energy use is based on the CEQA Guidelines Appendix F (Energy Conservation) which is focused on energy conservation through the efficient use of energy resources. Estimates of energy consumption associated with the proposed project are based, in part, on information provided by the California Emissions Estimator Model (CalEEMod) output included in Appendix B. Assumptions for construction and operations used to determine energy consumption are consistent with those used to determine air quality and GHG impacts. Furthermore, the proposed project is assessed for whether it would conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

Construction and operational energy for vehicles were calculated based on the off-road equipment use and on-road vehicle trips and distances described in Section 2.3. The energy calculation sheets are included as Appendix B.

3.5.5 - Construction

Fuel consumption for on-site construction equipment and off-site construction vehicles are calculated using results and data used in CalEEMod.

Off-road equipment fuel consumption is based on the mix of construction equipment and duration utilizing the CalEEMod inputs for the following:

- Number of pieces of equipment
- Duration of Use (days and hours per day)
- Operating Load Factor
- Fuel Type (gasoline, diesel or electric)
- Fuel consumption factors in terms of gallons per hour of diesel for off-road equipment were calculated using a factor of 0.054 gallons per brake-horsepower hour (gal/bhp-hr).13

Fuel consumption for worker, vendor and haul construction vehicles are also calculated based on CalEEMod inputs. The fuel consumption rates (miles per gallons) were obtained using the ARB EMFAC2021 Web Tool.[14] The rates were based on the County-specific inventory for the initial

[13] California Air Resources Board (ARB). 2021. Low Emission Diesel (LED) Study: Biodiesel and Renewable Diesel Emissions in Legacy and New Technology Diesel Engines. November 2021.

[14] California Air Resources Board (ARB). 2023. EMFAC Web Tool. Website: https://arb.ca.gov/emfac/emissions-inventory. Accessed March 6, 2025.

construction year and calculated for the vehicle categories for each vehicle type in CalEEMod. For Workers, the assumed fleet is based on field observations and is 25 percent light-duty auto (LDA), 50 percent light-duty truck type 1 (LDT1), and 25 percent light-duty truck type 2 (LDT2). Haul trucks were assumed to be 100 percent diesel heavy heavy-duty truck (HHDT). Vendor trucks during building construction were assumed to be entirely diesel-fueled and 50 percent medium heavy-duty truck (MHDT) and HHDT, while asphalt vendor trucks were assumed to all be diesel-fueled HHDT.

3.5.6 - Operation

Mobile Sources

Fuel consumption factors for operational mobile sources were calculated based on the VMT and operational fleet for each land use modeled in CalEEMod. The Emission Factors mobile source emissions model (EMFAC) WebTool was used to develop fuel consumption rates corresponding to the County fleet for the Operational Year modeled in CalEEMod. These up-to-date inventories include electric and conventional vehicle inventory data as well as Compressed Natural Gas (CNG) bus and truck data. Electric usage was characterized as kWh/vehicle-mile and fossil fuel usage by mpg. CNG usage is reported in gallons equivalent.

Building Energy

Natural gas and electricity estimates are based on CalEEMod energy calculations and included Title 24 and Non-Title 24 energy based on size, land use, electricity demand forecast zone and climate zone. CalEEMod energy calculations are based on 2019 Title 24 standards, providing somewhat conservative estimates of building energy use.[15]

The proposed project will be all-electric, and therefore is not associated with natural gas use. The additional electricity use to compensate for the lack of natural gas use has been accounted for in CalEEMod energy calculations. Most common natural gas end uses, which will be replaced by electricity, include space heating, water heating, and range (i.e., cooktop plus oven). Additional natural gas end uses include dryer, auxiliary heat, pool heat, spa heat, solar water heater with natural gas backup, and miscellaneous. The detailed energy calculation sheets are included as Appendix B.

3.5.7 - Thresholds of Significance

The lead agency utilizes the criteria in the CEQA Guidelines Appendix G Environmental Checklist to establish thresholds of significance to determine whether impacts to energy are significant environmental effects. As such, the City has determined that the proposed project would have a potential impact if it would:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

[15] California Air Pollution Control Officers Association (CAPCOA). 2021. Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity. Final Draft. December.

3.5.8 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the development of the project and provides mitigation measures where appropriate.

Energy Use

Impact ENER-1:	**The proposed project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.**

Impact Analysis

A discussion of the proposed project's anticipated energy usage is presented below. PG&E provides electricity service to the proposed project site. Energy use consumed by the proposed project was estimated and includes electricity and fuel consumption for project construction and operation. Energy calculations are included as part of Appendix B.

Construction

The proposed project's construction was assumed to begin in January 2026 and last approximately 18 months based on model defaults and applicant-provided information. If the construction schedule moves to later years, construction energy usage would likely decrease because of improvements in technology and more stringent regulatory requirements as older, less efficient equipment is replaced by newer and cleaner equipment. The proposed project would require demolition, site preparation, grading, building construction, architectural coating, and paving, in addition to off-site improvements along Dublin Canyon Road. The construction phase would require energy for the manufacture and transportation of building materials, preparation of the site (e.g., site clearing and grading), and the actual construction of the building. Petroleum-based fuels, such as diesel fuel and gasoline, would be the primary sources of energy for these tasks.

The types of on-site equipment used during construction of the proposed project could include gasoline- and diesel-powered construction and transportation equipment, including trucks, excavators, forklifts, and pavers. Construction equipment is estimated to consume a total of 64,192 gallons of diesel fuel over the entire construction duration (Appendix B).

Fuel use associated with construction vehicle trips generated by the proposed project was also estimated; trips include construction worker trips, haul truck trips for material transport, on-site trucks, and vendor trips for construction material deliveries. Fuel use from these vehicles traveling to the project site was based on (1) the projected number of trips the proposed project would generate during construction, (2) average trip distances by trip type, and (3) fuel efficiencies estimated in the ARB EMFAC mobile source emission model. The specific parameters used to estimate fuel usage are included in Appendix B. In total, the proposed project is estimated to generate 62,474 gallons of combined gasoline and diesel for vehicle travel during construction.

The overall construction schedule and process is designed to be efficient in order to avoid excess monetary costs. For example, equipment and fuel are not typically used wastefully due to the added expense associated with renting the equipment, maintaining it, and fueling it. Therefore, the

opportunities for future efficiency gains during construction are limited. Compliance with regulations such as the In-Use Off-Road Airborne Toxic Control Measures (ATCM) minimizes emissions by using a modern fleet, keeping equipment well-tuned and limiting idling to 5 minutes or less. Thus, it is anticipated that the construction phase of the proposed project would not result in wasteful, inefficient, and unnecessary consumption of energy. Construction-related energy impacts would be less than significant.

Operation

The proposed project would consume energy as part of building operations and transportation activities. The proposed project is all electric, and therefore is not associated with natural gas use. Project energy consumption is summarized in Table 3.5-1.

Table 3.5-1: Estimated Annual Project Energy Consumption (Operation)

Energy Consumption Activity	Annual Consumption
Operation Vehicle Fuel Consumption	43,861 gallons of gasoline
	6,165 gallons of diesel
	309 gallons of Compressed Natural Gas (CNG)
	30,200 kWh of electricity
Building Energy Consumption	185,546 kWh of electricity
Notes: kWh = kilowatt hour, kBTU = kilo-British Thermal Unit Source: Appendix B.	

As previously discussed, the proposed project could result in a potentially significant impact if it would result in wasteful, inefficient, or unnecessary consumption of energy resources. Considering the guidance provided by Appendix F of the CEQA Guidelines, a project would be considered to result in wasteful, inefficient, or unnecessary consumption of energy resources if it would conflict with the following energy conservation goals:

- Decreasing overall per capita energy consumption;
- Decreasing reliance on fossil fuels such as coal, natural gas, or oil; and
- Increasing reliance on renewable energy sources.

Decreasing Overall Per Capita Energy Consumption

The proposed project's buildings would be designed and constructed in accordance with CALGreen energy efficiency standards of Title 24. Title 24 standards include a broad set of energy conservation requirements that apply to the structural, mechanical, electrical, and plumbing systems in a building. For example, the Title 24 Lighting Power Density requirements define the maximum wattage of lighting that can be used in a building based on its square footage. Title 24 standards, widely regarded as the most advanced energy efficiency standards, would help to reduce the amount of energy required for lighting, water heating, and heating and air conditioning in buildings and would promote energy conservation. Therefore, the proposed project would be consistent with this

criterion. The decreasing reliance on fossil fuels and increasing use of renewable energy discussed below would also reduce per capita energy consumption for the proposed project.

Decreasing Reliance on Fossil Fuels and Increasing Reliance on Renewable Energy Sources

The proposed project would incorporate the required elements from CALGreen, which would include water efficient landscaping, heat reflecting roof membranes, EV charging infrastructure and roofing structures to support the installation of solar panels. The proposed project would be all-electric in design and therefore would directly decrease reliance on fossil fuels (natural gas). In addition, project design features would reduce the amount of electricity used by the proposed project during operation and, consequently, the amount of fossil fuels needed to generate power to meet this demand. For example, low water demand landscaping would reduce the amount of water that would need to be conveyed to the project site. As such, the proposed project would facilitate a greater dependence on renewable energy sources for building and transportation energy demands. Therefore, the proposed project would be consistent with these criteria.

Overall

As discussed above, the proposed project's energy consumption would not result in the wasteful, inefficient, or unnecessary consumption of energy resources, consistent with the guidance derived from Appendix F of the CEQA Guidelines. The construction-related and operation-related impacts related to electricity, natural gas, and fuel consumption would be less than significant. Therefore, the proposed project would not result in significant energy impacts.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

Energy Efficiency and Renewable Energy Standards Consistency

Impact ENER-2:	**The proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.**

Impact Analysis

The proposed project would utilize electricity from PG&E. According to PG&E, approximately 38 percent of the energy supplied is procured from renewable sources, with an additional 49 percent from non GHG-emitting nuclear generation, and 8 percent from large hydroelectric facilities (also non GHG-emitting).[16] Therefore, the proposed project's electricity provider meets the State's current objective of 33 percent renewable energy. PG&E would also be required to meet the State's future objective of 60 percent of in-State electricity sales being generated from renewable energy sources by 2030.

[16] Pacific Gas and Electric Company (PG&G). 2024. Website: https://www.pge.com/en/about/corporate-responsibility-and-sustainability/taking-responsibility/clean-energy-solutions.html/. Accessed March 7, 2025.

The proposed project would be required to comply with standards for new construction established by the State and BAAQMD and development standards in the California Energy Code, CALGreen, the Municipal Code, and other applicable federal, State, and local laws. In addition, the proposed project will be all-electric, which promotes the State's longer-term goals of decarbonization.

The proposed project would be consistent with the City's CAP 2.0 strategies for renewable energy and energy efficiency. Thus, the proposed project would decrease overall per capita energy consumption. Furthermore, the proposed project would be designed and constructed consistent with the Title 24 Building Energy Efficiency Standards then in effect and would be required to incorporate a series of renewable energy design and energy efficiency features. The proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources or conflict with the CAP 2.0's plan for renewable energy or energy efficiency.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None required.

3.5.9 - Cumulative Impacts

The cumulative analysis considers the foreseeable development projects listed in Chapter 3, Environmental Impact Analysis, Table 3-1, Cumulative Projects (and shown in Exhibit 3-1), in the City of Pleasanton, in addition to the proposed project. The geographic scope of the cumulative energy analysis is the PG&E service area and includes all of the projects identified on Table 3-1. All cumulative projects would be required to comply with City ordinances and policies that address energy conservation and energy efficiency, such as complying with the latest California Energy Code and Title 24 standards. This would ensure that cumulative projects would not result in wasteful, inefficient or unnecessary consumption of resources and would establish consistency with State and local plans. Accordingly, potential cumulative impacts would be less than significant. Additionally, cumulative projects would adhere to the City's reach code, which prohibits the use of natural gas in new construction.

Moreover, as described in the evaluation of Impact ENER-1 and ENER-2, the proposed project would not have a significant incremental contribution to the less than significant cumulative impacts. Like the development associated with the cumulative projects, development associated with the proposed project would be designed in accordance with Title 24, California's Energy Efficiency Standards for Residential Buildings and would comply with the latest CALGreen requirements for residential new construction. These standards include minimum energy efficiency requirements related to the building envelope, mechanical systems (e.g., HVAC and water heating systems), indoor and outdoor lighting, and illuminated signs.

The incorporation of the Title 24 standards into the proposed project and cumulative projects would ensure that implementation of these projects would not result in the inefficient, unnecessary, or wasteful consumption of energy. Therefore, the proposed project, in conjunction with other planned

and approved projects, would not have a cumulatively significant impact related to energy consumption.

Level of Cumulative Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

3.6 - Geology, Soils, and Seismicity

3.6.1 - Introduction

This section describes existing conditions related to geology, soils, and seismicity in the region and project area as well as the relevant regulatory framework. This section also evaluates the possible impacts related to geology and soils that could result from project implementation. Information included in this section is based, in part, on the Updated Preliminary Geotechnical & Geologic Report prepared by Cornerstone Earth Group dated March 31, 2020, University of California Museum of Paleontology (UCMP) paleontological records search request and an Updated Geotechnical Review prepared by Ninyo & Moore dated February 12, 2025, which are included in Appendix E as well as the City of Pleasanton General Plan, Association of Bay Area Governments (ABAG) Resilience Program, and the United States Geological Survey (USGS). During the Environmental Impact Report (EIR) scoping period, one comment was received related to geology and soils.

- General objections to grading and building on protected slopes.

3.6.2 - Environmental Setting

Geologic Setting

Alameda County

Alameda County is located in the western Diablo Range within the Coast Ranges geomorphic province of California. The Coast Ranges have a complex geological history characterized by Late Tertiary folding and faulting that has resulted in a series of northwest trending mountain ranges with intervening alluvial valleys. Bedrock in the Coast Ranges consists of igneous, metamorphic and sedimentary rocks that range in age from Jurassic to Pleistocene. The present physiography and geology of the Coast Ranges are the result of deformation and deposition along the tectonic boundary between the North American plate and the Pacific plate. Plate boundary fault movements are largely concentrated along the well-known fault zones, which in the area include the San Andreas Fault, Hayward Fault, and Calaveras Fault, as well as other lesser-order faults.

Project Site

The project site is located in unincorporated Alameda County, within the northwestern portion of the City of Pleasanton's urban growth boundary near Devany Canyon. The project site consists of a series of hills and knolls, sloping down to a canyon bordering the southeast site boundary. The highest elevation on the project site is approximately 774 feet above mean sea level (AMSL) at the ridgeline in the proposed East Bay Regional Park District (EBRPD) open space area, and the lowest elevation is approximately 438 feet AMSL along Devany Creek. Exhibit 2-8, Slope Analysis and Grading Plan, identified areas where slopes exceed 25 percent, and how the proposed site plan is situated to largely avoid them.

As noted in the geotechnical report prepared by Cornerstone Earth Group, the geologic units mapped as trending through the site include Miocene-age marine sedimentary rocks incorporated with sandstone, siltstone, and siliceous shale folded and transected by inactive northwest trending

faults that are overlain by colluvial and residual soils. Other formations in the project area include an unnamed Miocene siltstone and clay shale (Tmc), the Miocene Clairmont Shale member of the Monterey Formation (Tm), and an unnamed Miocene sandstone (Tms). Locally overlaying these geological formations within low-lying areas and the valley bottom near Devany Creek are Quaternary alluvium (Qa). However, there have been some historic variations on the classification of the Monterey Formation either being defined as a formation or group. In this analysis, the Monterey Formation will be classified as a formation that contains the Claremont Shale member.

Subsurface Conditions

Subsurface conditions are discussed in this section including existing soils on the project site, regional groundwater levels, and potential subsurface hazards including subsidence, expansive soils, and collapsable soils.

Existing Soils

The project site is comprised mainly of Diablo clay series on the southeastern and northeastern slopes, and a portion of Millsholm silt loam on the southwestern side. The Diablo clay is characterized as well drained with slow permeability consisting of a heavy clay loam, silty clay or clay texture that is typically associated with rolling to steep slopes between 5 to 50 percent in grade. Diablo clay typically contains cracks in dry soil ½ to 2 inches wide from the surface to a depth of 20 to 40 inches during the dry season which close during the wet season. Moist Diablo clay consists of a medium to rapid surface runoff due to its slow permeability, expansive capabilities, and topographic setting.[1] The Millsholm silt loam series is well drained with a moderate permeability situated with slopes between 5 to 75 percent in grade with a clay, silty clay, gravely clay, gravely sandy clay loam, or loam texture and may have 35 percent rock fragments, and fluctuates in moisture content seasonally from California's Mediterranean climate. The Millsholm silt loam associated with the southwestern side of the project site has a moderate K Factor, which measures the soil's susceptibility to sheet and rill erosion from water under natural conditions. However, the Millsholm silt loam is classified as having a severe susceptibility to erosion if exposed to disturbance activities, most likely due to the project site's steep terrain along with having a moderate K factor. Furthermore, soils with a clayey texture tend to have larger and more durable aggregates that do not contribute to fugitive dust emissions and have a high resistance to wind erosion under natural conditions unless aggregates are broken down by surface disturbance.[2]

In addition, the Updated Preliminary Geotechnical and Geologic Report from Cornerstone Earth Group analyzed subsurface conditions and determined that soils on the project site vary but are mostly comprised of residual soil and colluvium consisting of stiff to stiff lean to fat clays with a shallow depth between 0.5-foot to 2 feet at the highest elevations of the project site and increase in depth within the troughs and drainage swales between the higher ridges with an approximate thickness between 5 to 11 feet. Soils differ on the northern portion of the project site with colluvium and residual soil approximately 6 feet thick that is underlain by an additional layer of very stiff sandy

[1] United States Department of Agriculture (USDA). Diablo Series. 2017. Website: https://soilseries.sc.egov.usda.gov/OSD_Docs/D/Diablo.html. Accessed February 13, 2025.
[2] United States Department of Agriculture (USDA). Natural Resources Conservation Service. Web Soil Survey. n.d. Website: https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx. Accessed February 13, 2025.

lean clay alluvium, and the southeastern portion of the project site along Devany Creek with alluvial terrace deposits comprised of sand and gravel.[3]

Groundwater

Fluctuations in groundwater can vary based on natural factors such as rainfall and soil characteristics, and non-natural processes including irrigation practices. The City of Pleasanton is located on the Livermore Valley Groundwater Basin which is located in the lower elevations of the Tri-Valley and percolates in a southwest direction from the Altamont Pass in the east at 600 feet AMSL to the Arroyo de la Laguna in the west at 280 feet AMSL and flows into the Sunol Groundwater Basin south of Pleasanton.[4] The closest groundwater well to the project site within the Livermore Valley Groundwater Basin is approximately 1.2 miles northwest of the project site with the most recent spring and fall measurements listed at 20 feet and 25 feet below the surface respectively.[5]

The Updated Preliminary Geotechnical and Geologic Report indicated that groundwater was not encountered in test pits excavated to a depth ranging from 3 to 18 feet beneath the surface within the higher elevations on the western and southern portions of the project site. However, shallow groundwater may be present in swale areas and along Devany Creek on the eastern side of the project site, as perched groundwater that is separate from the aquifer.[6]

Subsidence

Subsidence is the gradual and widespread sinking of the surface due to the removal of groundwater or other mineral resources within the subsurface from overexploitation, causing compaction of sediments. Subsidence may also occur from earthquakes, additional loading of structures, or sinkhole formation. Soils highly susceptible to subsidence are clays and silts due to their shrink and swell potential depending on moisture content. As previously mentioned, subsurface conditions on the project site consist of Diablo clay and Millsholm silt loam where both soils consist of a clayey texture and fluctuate in moisture content seasonally from California's Mediterranean climate. The Updated Preliminary Geotechnical and Geologic Report indicated most soils on the project site having a clayey texture within residual soil and colluvium. Although soils on the project site display characteristics susceptible to subsidence, areas in California that have experienced subsidence were generated from excessive groundwater pumping in the twentieth century. The closest area that experienced subsidence to the project site is the Santa Clara Valley where extensive agriculture overexploited the groundwater supply in the early 1900s with subsidence greatest in San Jose, California experiencing gradual sinking of 14 feet between 1910 and 1995. However, efforts from the Santa Clara Valley Water District and the State Water Project successfully imported water for groundwater recharge and subsidence has ceased.[7]

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[3] Cornerstone Earth Group. 2020. Updated Preliminary Geotechnical and Geologic Report. March 31.
[4] California Department of Water Resources (DWR). 2006. California Groundwater Bulletin 118, Livermore Valley Groundwater Basin. January 20.
[5] ArcGIS. California's Groundwater Live: Groundwater Levels. n.d. Website: https://storymaps.arcgis.com/stories/b3886b33b49c4fa8adf2ae8bdd8f16c3. Accessed February 25, 2025.
[6] Cornerstone Earth Group. 2020. Updated Preliminary Geotechnical and Geologic Report. March 31.
[7] United States Geological Survey (USGS). n.d. Website: https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html. Accessed February 26, 2025.

Expansive Soils

Expansive soils are clays or silty clays that experience significant volume changes with the removal or addition of moisture and can be considered a geological hazard as the shrinking and swelling potential in volume can generate damage to foundations, underground public utilities, and structures including walls and ceilings. Most of the project site is situated on Diablo clay which have expansive capabilities as the seasonal fluctuations in moisture content can cause soils to shrink during the dry season exposing cracks two inches wide with a depth of 20 to 40 inches that close through expansion during the wet season. Previous studies on the project site referenced in the Updated Preliminary Geotechnical and Geologic Report measured the plasticity index of the colluvial soil at depths ranging from one to three feet on the northern edge of the project site. Soil plasticity is the ability of a soil to undergo deformation without cracking which is caused from the adsorption of additional water between clay particles that allows particles to move over one another without fracturing. The plasticity index, which is the range in moisture content where soils experience plasticity, indicated moderate to high plasticity and expansion potential for the colluvial soil.[8]

Collapsible Soil

Collapsible soil generally consists of sand and silt sized particles that are held together by a bonding material such as clay. Soil particles can decrease in volume or become rearranged when undergoing additional wetting or loading with the occurrence depending on a variety of factors including soil texture, structure, initial moisture content, and void ratio.[9] Collapsible soils naturally occur in alluvial and colluvial deposits or residual soils in arid and semi-arid environments that are either shallow or deep, or can occur on poorly engineered artificial fills which can lead to structural damage. As previously discussed, soils on the project site consists of stiff clays from residual soil and colluvium with expansive capabilities that fluctuate in moisture content seasonally, and therefore, contain some characteristics of collapsible soil.

Seismicity

The term seismicity describes the effects of seismic waves that are radiated from an earthquake fault in motion that generates strong seismic shaking. While most of the energy released during an earthquake results in the permanent displacement of the ground, as much as 10 percent of the energy may dissipate immediately in the form of seismic waves. Ground movement during an earthquake can vary depending on the overall magnitude, distance to the fault, focus of earthquake energy, type of geologic material, and structure resilience. The composition of underlying soils, even those relatively distant from faults, can intensify ground shaking. Strong ground shaking from an earthquake can result in damage, with buildings shifted off their foundations and underground pipes broken. Seismicity from strong seismic shaking can generate a variety of secondary seismic-related hazards such as surface fault rupture, liquefaction, landslides, and lateral spreading. Seismic ground shaking and secondary seismic-related hazards in the surrounding region are discussed in detail further below.

[8] Cornerstone Earth Group. 2020. Updated Preliminary Geotechnical and Geologic Report. March 31.
[9] California Department of Transportation (Caltrans). 2024. Geotechnical Manual: Collapsible Soil. February.

Surface Rupture

Surface rupture occurs when strong shaking generated from an earthquake causes movement along an active fault (one that has ruptured in the past 11,000 years) to break through, or cause offset directly on the earth's surface. Fault lines capable of producing surface rupture can either trigger vertical offsets which are typically associated with normal and reverse faulting, or lateral offsets usually generated from strike-slip faulting. In addition, surface rupture can happen either rapidly during strong seismic shaking, or gradually from aseismic creep which can offset structures and foundations over long periods of time. Because of surface rupture posing greater threats to structures located directly, or in proximity to active fault lines susceptible to producing surface rupture, the State of California established regulatory zones surrounding active fault lines under the Alquist-Priolo Earthquake Fault Zoning Act of 1972 to prevent the construction of structures within approximately 50 feet of active fault lines.

The San Francisco Bay Area has approximately 13 fault zones that are classified as Special Study Zones under the Alquist-Priolo Earthquake Fault Zoning Act that pose the risk of rupturing during strong seismic shaking. Rock units on the project site are transected by northwest trending faults with one subsidiary fault within the Devany Creek channel south of the project site. However, the fault lines that transect the project site cut through Tertiary geologic units and do not offset Quaternary age geologic units. As such, these faults are considered inactive and are not delineated within an Alquist-Priolo Earthquake Fault Zone.[10] The closest active fault line capable of producing surface rupture is the Calaveras Fault which strikes in a northwest direction approximately 0.7 mile east of the project site.

Seismicity and Faulting

Seismic ground shaking is caused by the sudden movement along active fault lines resulting in the release of stored energy in the form of seismic waves. The intensity of ground shaking is influenced by many factors such as the type of local geology, distance from the epicenter, direction of rupture, and depth of the hypocenter. Seismic ground shaking is calculated either using the Richter Scale which calculates the amplitude of the largest wave and the epicenter distance using a logarithmic scale, and the Modified Mercalli Intensity Scale (MMI) which is arbitrary based on observations from earthquake intensity on a scale from 1-12 designated by roman numerals.

The project site is located in the San Francisco Bay Area which is a seismically active region with major fault lines and numerous lesser-known faults. Many of the fault lines are right lateral strike-slip faults that strike in a northwest direction and are associated with the San Andreas Fault Zone which separates the Pacific Plate and the North American Plate. The project site is situated on inactive fault lines that have folded the local geology which are incapable of generating strong seismic shaking. However, the ABAG Resilience Program rates shaking severity according to the MMI. The ABAG places the site of the proposed project within the Very Strong–MMI VIII shaking severity zone for the Calaveras Fault.[11] An MMI between six and 10 is considered high intensity and capable of damaging buildings. The closest major active fault lines to the project site are the Calaveras Fault

[10] Ninyo & Moore. 2025. Update Geotechnical Review Hidden Canyon Residences and Preserve, Dublin Canyon Road, Pleasanton, California. February 12, 2025.

[11] Association of Bay Area Governments (ABAG). MTC/ABAG Hazard Viewer Map. Website: https://mtc.maps.arcgis.com/apps/webappviewer/index.html?id=4a6f3f1259df42eab29b35dfcd086fc8. Accessed May 7, 2025.

approximately 0.7 mile east of the project site, the Hayward Fault approximately 6.2 miles west of the project site, the Greenville Fault approximately 12.2 miles northeast of the project site, and the Concord-Green Valley Fault located approximately 13.3 miles north of the project site. Other lesser-known faults are located east of the project site including the Pleasanton Fault, the Verona Fault, and the Dublin Fault located around Interstate 580 (I-580). The four major fault lines in proximity to the project site are discussed in further detail below.

Calaveras Fault

The Calaveras Fault is a major right lateral strike-slip fault in the eastern San Francisco Bay Area extending in a northwest direction about 93 miles from San Ramon, California in the north to Hollister, California in the south where it converges with the San Andreas Fault. The Calaveras Fault is divided into four segments characterized by having differences in slip rates, recurrence intervals, and paleo seismic events. The closest segment to the project site is the Northern Calaveras segment approximately 0.7 mile east of the project site that begins north of the Calaveras Reservoir and transects the Tri-Valley and San Ramon Valley areas consisting of a slip rate of approximately 5-6 mm/year with sparse seismicity, and capability of producing surface rupture during moderate to large earthquakes. The northern segment has a reoccurrence interval between approximately 125 and 850 years with paleo seismic events that occurred between AD 1425 and AD 655 and between AD 1861 and AD 1160 both in the Diablo Ranges south of Sunol.[12] Recent notable earthquakes generated from the Calaveras Fault include the 1984 Morgan Hill earthquake with a magnitude of 6.3 on the Richter Scale, the 1979 Coyote Lake earthquake with a magnitude of 5.8, and a magnitude 6.2 in 1858 with severe shaking recorded in Pacheco, California.

Hayward Fault

The Hayward Fault is a major right lateral strike-slip fault between the eastern margins on the San Francisco Bay and western front of the East Bay Hills which strikes in a northwest direction from eastern San Jose in the south to San Pablo Bay in the north totaling approximately 66 miles in length. The fault has three sections with the closest section being the Southern Hayward section approximately 6.2 miles west of the project site that is characterized as having a minimum horizontal displacement slip rate of 5mm/year with about six to eight paleo seismic events in the past 2,100 radiocarbon years and an average reoccurrence interval of 150-205 years. The last maximum event generated by the Southern Hayward section was the 1868 Hayward earthquake producing a magnitude of 7.0 on the Richter Scale with surface rupture extending 32 miles north of the epicenter.[13]

Greenville Fault

The Greenville Fault is a major right lateral strike-slip fault that strikes in a northwest direction from San Antonio Valley in the Diablo Ranges in the south and ends on the northeastern side of Mount Diablo, traversing approximately 56.5 miles in length. The Greenville Fault is divided into four segments based on geomorphic expression and structural character with the closest segment being the Marsh Creek-Greenville segment approximately 13.3 miles northeast of the project site which

[12] Bryant, W.A., S.E. Cluett. 1999. Fault number 54a, Calaveras Fault Zone, Northern Calaveras section, Quaternary fault and fold database of the United States. March 4.

[13] Bryant, W.A., S.E. Cluett. 2000. Fault number 55a, Hayward Fault Zone, Northern Hayward section, Quaternary fault and fold database of the United States. December 14.

extends roughly 22 miles. The Marsh Creek-Greenville segment has an estimated reoccurrence interval of 4,200 years based on an assumed maximum event having a magnitude of 6.5 on the Richter Scale, and has a slip rate of 0.1-0.3 mm/year.[14] The most recent notable event associated with the Marsh Creek-Greenville segment is the 1980 Livermore earthquakes with a magnitude of 5.8 and 5.1 with an epicenter near the Los Vaqueros Reservoir[15] and resulted in minor surface rupture.[16]

Concord Fault

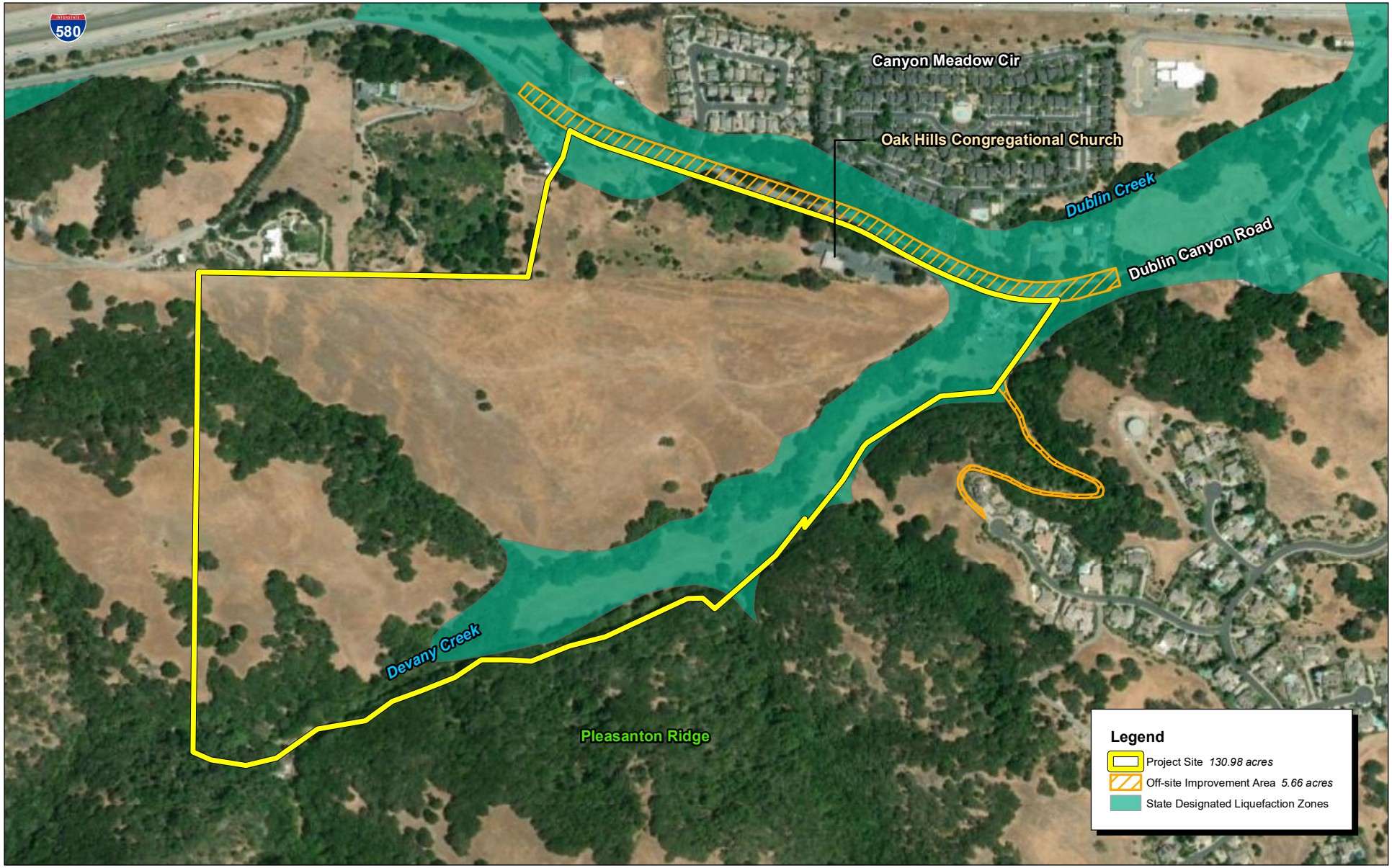
The Concord Fault is a major right lateral strike-slip fault that strikes in a northwest direction from the northwest corner of Mount Diablo in the south to the Suisun Bay in the north spanning approximately 12.4 miles in length and directly transects the City of Concord. The fault line is located approximately 13.3 miles north of the project site. The fault has no established maximum events or reoccurrence interval. However, the most recent notable earthquake occurred in 1955 with a magnitude of 5.4 on the Richter Scale and a swarm of smaller earthquakes occurred in 2015. In addition, the fault is highly characterized by aseismic creep with a slip rate between 3.0-3.5 mm/year.[17]

Liquefaction

Liquefaction is a phenomenon that occurs in loose water-saturated sandy soils with a shallow water table. Strong seismic waves generated from an earthquake can cause the water table to temporarily rise, pulling aggregates apart and turning the soil from a solid into a temporary liquid-like state. Damage from strong seismic shaking is typically more severe in areas susceptible to liquefaction such as areas of artificial landfills and is usually associated with the subsidence or tilting of structures and may cause internal utility lines to rise to the surface. As previously mentioned, soils on the project site are mostly comprised of Diablo clay consisting of a heavy clay loam, silty clay or clay texture and the Updated Geotechnical and Geologic Report indicated subsurface conditions to comprise of a thin layer of residual soil and colluvium with stiff to stiff lean to fat clays and no groundwater to be present as identified in test pit excavation between 3-18 feet in depth. However, the northern edge and southeastern portions of the project site consist of younger alluvium consisting of sands, clays, and gravels with perched groundwater within the southeastern portion of the project site along Devany Creek.[18] In addition, the California Geological Survey (CGS) identifies the northern edge and southeastern portions of the project site to be within a State-designated Liquefaction Zone of required investigation; see Exhibit 3.6-1.[19]

[14] Bryant, W.A., S.E. Cluett. 2002. Greenville fault zone, Marsh Creek-Greenville section (Class A) No. 53b, Quaternary fault and fold database of the United States. June 25.
[15] California Department of Conservation. 2017. Website: https://maps.conservation.ca.gov/cgs/historicearthquakes/. Accessed February 25, 2025.
[16] Bryant, W.A., S.E. Cluett. 2002. Greenville fault zone, Marsh Creek-Greenville section (Class A) No. 53b, Quaternary fault and fold database of the United States. June 25.
[17] Bryant, W.A., S.E., Cluett. 1998. Fault number 38a, Concord fault, Avon section, Quaternary fault and fold database of the United States. August 18.
[18] Cornerstone Earth Group. 2020. Updated Preliminary Geotechnical and Geologic Report. March 31.
[19] California Department of Conservation. 2025. Earthquake Zones of Required Investigation. 2025. Website: https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/. Accessed February 25, 2025.

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Source: ESRI Aerial Imagery. RUGGERI~JENSEN~AZAR, March 2025. City of Pleasanton. California Natural Resources Agency, Nov 20th, 2024.

FIRSTCARBON SOLUTIONS™

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Feet

Exhibit 3.6-1
State Designated Liquefaction Zones of Required Investigation

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As such, the Updated Geotechnical and Geologic Report identified low potential of liquefaction for the main development area and a moderate to high liquefaction potential for development on the northeast corner of the project site.

Slope Disturbance

Slope disturbance from long-term geologic cycle of uplift, mass wasting, intense precipitation or wind, and gravity can result in slope failure in the form of mudslides and rock fall. The project area is seismically active with known faults; however, the project area does not contain active faults that would cause geologic uplifting. Mass wasting refers to a variety of erosional processes from gradual downhill soil creep to mudslides, debris flows, landslides, and rock fall—processes that are commonly triggered by intense precipitation or wind, which varies according to climactic shifts. Often, various forms of mass wasting are grouped together as landslides, which are generally used to describe the downhill movement of rock and soil. Soil creep is a long-term, gradual downhill migration of soil under the influence of gravity and is generally on the order of a fraction of an inch per year. These soils can creep away downslope sides of foundations and reduce lateral support.

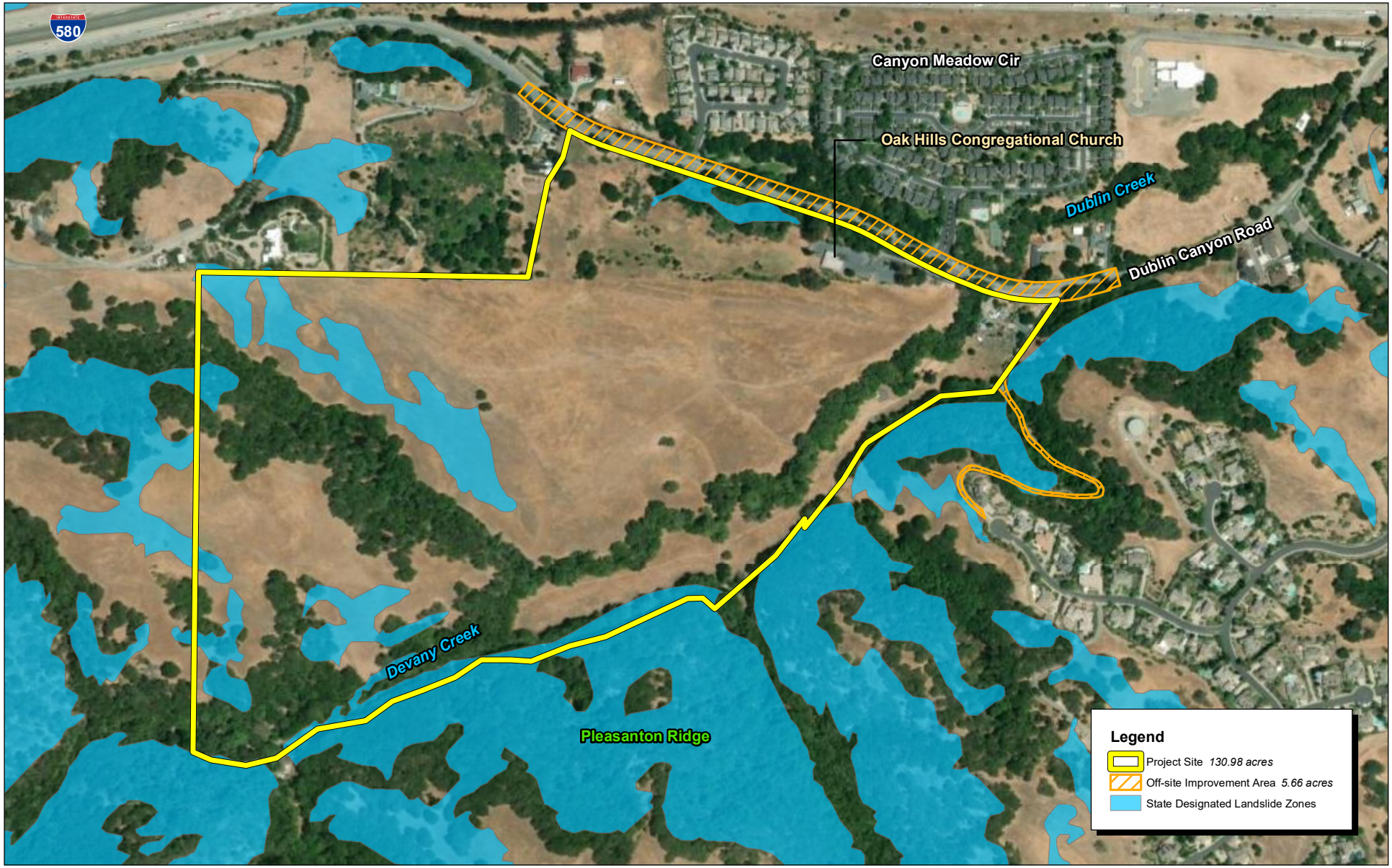
The City of Pleasanton is located within the Tri-Valley region in Alameda County, expanding from the City of Dublin in the north to the City of Livermore in the east, with elevations ranging from approximately 320 to 600 feet AMSL that separates Mt. Diablo to the north from the Diablo Ranges to the south, while the East Bay Hills borders the Tri-Valley to the west. Most of the urbanized areas in Pleasanton are situated in the Tri-Valley on flat terrain and are not located in a CGS Zone of Required Investigation for seismic landslide hazards. Areas that are more susceptible to landslides within the municipality that are delineated in Zones of Required Investigation by the CGS are areas of higher elevation located south and southeast of Bernal Avenue, and on the eastern aspect of the East Bay Hills west of the Calaveras Fault line and Foothill Road.[20]

The project site is located adjacent to the western limits of the City and on the eastern side of the East Bay Hills. The CGS identifies areas of the northern and southeastern portions of the project site to be within a State-designated Landslide Zone of required investigation; see Exhibit 3.6-2. The project site is transected by a ridgeline striking in a westward direction with the highest point in elevation approximately 743 feet AMSL on the far northwestern side of the project site. The ridgeline produces two slopes with northeast and southeast aspects that are 200 feet in height with a moderately steep incline. The northeast aspect of the slope faces toward Dublin Canyon Road and I-580 consisting of scattered vegetation at the higher elevations and dense trees toward the lower elevations along Dubin Canyon Road. The southeast aspect contains steeper slopes covered with annual grasses and consists of gullies on the eastern side of the project site that drains into Devany Creek where vegetation becomes denser. The Geotechnical Review prepared by Ninyo & Moore on February 12, 2025, indicates that the far western end of the northeast aspect of the ridgeline has a relatively high susceptibility to landsliding but concluded no landslide to be present; the southeast aspect of the ridgeline contains four shallow landslides within colluvium-filled gullies above Devany Canyon generated from seasonal downhill creep of surficial colluvial soils indicating potential slope instability.[21]

[20] California Department of Conservation. 2025. Earthquake Zones of Required Investigation. 2025. Website: https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/. Accessed February 25, 2025.

[21] Ninyo & Moore. 2025. Update Geotechnical Review Hidden Canyon Residences and Preserve, Dublin Canyon Road, Pleasanton, California. February 12, 2025.

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Source: ESRI Aerial Imagery. RUGGERI~JENSEN~AZAR, March 2025. City of Pleasanton. Department of Conservation, 2025.

FIRSTCARBON SOLUTIONS™

600 300 0 600
Feet

Exhibit 3.6-2
State Designated Landslide Zones of Required Investigation

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Lateral Spreading

Lateral spreading is a secondary hazard generated from strong seismic shaking and liquefaction that occurs on nearly horizontal slopes comprised of coherent material overlaying saturated and loose sediments that are susceptible to liquefaction. Primary hazards such as strong seismic shaking induces liquefaction to occur within the lower saturated soils causing the upper cohesive material to fracture and entrain slowly downslope. As previously mentioned, subsurface conditions on the project site consists of mostly the Diablo Clay and Millsholm silt series that are composed of a clayey texture. The Updated Geotechnical and Geologic Report determined that the project site is underlain by colluvium and residual soils comprised of clays that are cohesive in texture that are thin at higher elevations and increase in depth at the lower elevations and drainage swales on the project site. The residual soils and colluvium overlay shallow bedrock consisting of Miocene siltstone and clay shale (Tmc), and the Miocene Clairmont Shale member of the Monterey Formation (Tm). In addition, subsurface conditions underlaying Devany Creek consist of young alluvial soils consisting of sands and gravels. Since the colluvium and residual soils on the project site overlay shallow bedrock that are not loosely deposited sediments, the potential for lateral spreading is determined to be low. However, development along Devany Creek may be susceptible to lateral movement due to containing younger alluvial sandy and gravely deposits that face the Devany Creek channels.[22]

Paleontological Resources

Fossils are nonrenewable resources which can consist of body and trace fossils or can be petrified through replacement of the original fossil with minerals. Geomorphological areas that tend to have higher paleontological sensitivity are areas of lower elevation where deposition has been greater such as basins, valleys, and floodplains. Rock units that have high paleontological sensitivity are classified within the Society of Vertebrate Paleontology (SVP) Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources as middle-Holocene or older sedimentary formations lithologically suitable for the preservation of fossils such as fine-grained fluvial, marine, and cross-bedded point bar sandstones, or argillaceous paleosols, some volcaniclastic formations, and low-grade metamorphic rocks that have yielded significant paleontological resources within their geographical extent, while rock units characterized as having low potential are those that poorly represent fossil specimens in institutional collections, such as basalt flows and recently deposited colluvium.

Most of the project site's surficial conditions consist of colluvium and residual soils with shallow depths from 0.5-foot to 2 feet on the tops of ridges that increases approximately 5 to 11 feet in depth within the troughs and drainage swales, with the exception of recently deposited Quaternary alluvium terrace deposits on the southeastern portion of the project site along Devaney Creek. The colluvium and residual soils overlay marine sedimentary rock units of Miocene age including sandstone, siltstone, and siliceous shale comprised of the Clairmont Shale Member (or Formation) that is part of the Monterey Formation (or Group) (Tm), along with an undifferentiated part of the Monterey Formation (Tmc). As previously discussed, there are historic variations in the nomenclature of the geology of the sediments classified as the Monterey Formation or Group. For

[22] Cornerstone Earth Group. 2020. Updated Preliminary Geotechnical and Geologic Report. March 31.

most of the last century it was regarded as a formation. Most recently it has been treated as a group containing the Claremont Shale and Sobrante Sandstone which were classified as formations.

For this analysis, the Monterey Formation will be considered a formation which contains the Claremont Shale and Sobrante Sandstone members. While the project site is not located within an area of deposition except for the Quaternary alluvium along Devany Creek, the region was prehistorically uplifted by tectonic processes from the Pacific Ocean and further deformed by the North American and Pacific Plate boundary. As such, invertebrate fossils such as clams, mollusks, and shells may be present in the Monterey Formation (or Group) and its associated members.

The UCMP provides the Locality Search, an online database that displays a list of vertebrates, invertebrates, microfossils, and plant localities associated with its institution. The data distributes each locality's ID and name along with the County of discovery, the geologic period and epoch, storage age, and sometimes the related rock formation and taxonomy units and specimen associated with the fossil locality. Although the UCMP Locality Database Search does not provide the absolute location of localities within a project area, the associated names may indicate approximate locations. According to the preliminary analysis using the UCMP Locality Search, at least five vertebrate fossils associated with the Miocene Claremont Member (or Formation) and Monterey Formation (or Group) (Tm) have been discovered in Alameda County with three found during the excavation of the fourth bore for the Caldecott Tunnel in Oakland. These three have a storage age of Clarendonian within the North American Land Mammal Ages (NALMA). Numerous Monterey Formation (or Group) (Tm) localities within the County have produced invertebrate fossils.

A records search request was sent to the UCMP on March 6, 2025, to obtain complete information on the fossil localities listed within its repository that are associated with the rock units and geography of the project area to determine the potential of ground-disturbing activities during construction of the proposed project to disturb and uncover significant paleontological resources. The UCMP completed its records search on March 25, 2025, and confirmed the project site to be underlain by Miocene rock units which classified the Monterey Formation as the Monterey Group. The records search indicated no fossil localities to be uncovered on the direct project site within the Monterey Formation (or Group). However, the UCMP identified three vertebrate localities, and 13 invertebrate localities uncovered from Miocene rock units northwest of the project site along I-580. Of these localities, two vertebrate localities were uncovered approximately 3.5 miles west to northwest from the project site within the Sobrante Sandstone member of the Monterey Formation and yielded five specimens with taxon consisting of Mammalia, Chondrichthyes, and Allodesmus.

The invertebrate localities were uncovered from the Claremont Shale and Sobrante Sandstone members, the Monterey Formation (or Group), and the San Pablo Formation and consisted of several mollusks including those from the Class Bivalve, Gastropod, and Scaphopod. Although most of the surficial conditions on the project site are overlaid by rock units with low paleontological potential consisting of colluvium and residual soils due to their recent deposition and relatively young age, excavations exceeding the depths of the low potential rock units may disturb the Monterey Formation (or Group) and the Claremont Shale member (or Formation). These rock units consist of marine sedimentary rock units matching the SVP Standard Procedures definition as having high paleontological potential, and have previously contained fossil localities yielding vertebrates

and invertebrates in the project vicinity. Ground-disturbing activities associated with the subsurface conditions on the project site may have high potential for yielding significant paleontological resources. UCMP Paleontological records search results can be found in Appendix E.

3.6.3 - Regulatory Framework

Federal

National Earthquake Hazards Reduction Program

The National Earthquake Hazards Reduction Program (NEHRP) was established by the United States Congress when it passed the Earthquake Hazards Reduction Act of 1977, Public Law 95–124. In establishing the NEHRP, Congress recognized that earthquake-related losses could be reduced through improved design and construction methods and practices, land use controls and redevelopment, prediction techniques and early warning systems, coordinated emergency preparedness plans, and public education and involvement programs. The four basic goals remain unchanged:

- Develop effective practices and policies for earthquake loss reduction and accelerate their implementation.
- Improve techniques for reducing earthquake vulnerabilities of facilities and systems.
- Improve earthquake hazards identification and risk assessment methods, and their use.
- Improve the understanding of earthquakes and their effects.

Several key federal agencies contribute to earthquake mitigation efforts. There are four primary NEHRP agencies:

- National Institute of Standards and Technology of the Department of Commerce
- National Science Foundation
- USGS of the Department of the Interior
- Federal Emergency Management Agency (FEMA) of the Department of Homeland Security

Implementation of NEHRP priorities is accomplished primarily through original research, publications, and recommendations to assist and guide State, regional, and local agencies in the development of plans and policies to promote safety and emergency planning.

National Pollutant Discharge Elimination System

The National Pollutant Discharge Elimination System (NPDES) permit program, authorized by Section 402(p) of the federal Clean Water Act, controls water pollution by regulating point sources, such as construction sites and industrial operations that discharge pollutants into waters of the United States. A Storm Water Pollution Prevention Plan (SWPPP) is required to control discharges from a project site, including soil erosion, to protect waterways. A SWPPP describes the measures or practices to control discharges during both the construction and operational phases of the project. A SWPPP identifies project design features and structural and nonstructural Best Management

Practices (BMPs) that will be used to control, prevent, remove, or reduce stormwater pollution from the site, including sediment from erosion.

Excavation Rules and Regulations

Title 29 in the Code of Federal Regulations, Part 1926, Subpart P contains rules and regulations for site excavations. Subpart P applies to all open excavations made in the earth's surface. Specific excavation requirements regulate surface encumbrances, underground installations, access and egress, hazardous atmospheres, stability of structures, protection of employees from loose rock or soil, inspections, and walkthroughs.

Paleontological Resources Preservation Act

The Paleontological Resources Preservation Act of 2002 codifies the generally accepted practice of limited vertebrate fossil collection and limited collection of other rare and scientifically significant fossils by qualified researchers. Researchers must obtain a permit from the appropriate State or federal agency and agree to donate any materials recovered to recognized public institutions where they would remain accessible to the public and other researchers.

Society of Vertebrate Paleontology Guidelines

The SVP is a national scientific organization of professional vertebrate Paleontologist that established Standard Guidelines for assessing the potential impacts that projects may have on paleontological resources and provides measures to mitigate those impacts that can be applied to both private and public lands under local, State, and federal agencies. The SVP classifies rock units based on paleontological potential as either having high, undetermined, low, or no potential for uncovering significant or abundant paleontological resources that may provide new scientific information for a variety of disciplines and are provided below:

- High Potential–Rock units which may contain vertebrate or significant invertebrate, plant, or trace fossils with datable organic remains, or rock units that may contain new vertebrate deposits, traces, or trackways. Rock units of high potential are dated to be middle-Holocene or older which include sedimentary formations such as fine-grained fluvial sandstones, argillaceous and carbonate-rich paleosols, and fine-grained marine sandstones, some volcaniclastic formations, and some low-grade metamorphic rocks.
- Undetermined Potential–Rock units with little information available related to their paleontological content, depositional environment, and geologic age. A field survey by a qualified professional Paleontologist is necessary to determine whether these rock units have high or low potential before a paleontological resource impact mitigation program can be developed.
- Rock units that only preserve fossils in rare circumstances and are poorly represented by fossil specimens in institutional collections such as basalt flows and recent colluvium.
- No Potential–Rock units that are not associated with containing fossils such as high-grade metamorphic rocks and plutonic igneous rocks.

The SVP's Standard Guidelines identify that project sites with rock units having high, undetermined, and low potential should perform a paleontological resource impact assessment before ground-disturbing activities begin, including performing a literature review, field survey, and consulting with a certified repository institution with localities in the project region. Project sites that contain rock units having high or undetermined potential should prepare a paleontological resource impact mitigation plan including monitoring ground-disturbing activities, and appropriate methods for salvaging, sampling, identifying, preparing, cataloging, curating, and storing significant paleontological resources uncovered during ground-disturbing activities. Most practicing professional paleontologists in the nation adhere to the SVP's Standard Guidelines.

State

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act (Public Resources Code [PRC] Sections 2621 to 2630) was passed in 1972 to provide a statewide mechanism for reducing the hazard of surface fault rupture to structures used for human occupancy. The main purpose of the Act is to prevent the siting of buildings used for human occupancy across the traces of active faults. It should be noted that the Act addresses the potential hazard of surface fault rupture and is not directed toward other earthquake hazards, such as seismically induced ground shaking or landslides.

The law requires the State Geologist to identify regulatory zones (known as Earthquake Fault Zones or Alquist-Priolo Earthquake Fault Zones) around the surface traces of active faults, and to depict these zones on topographic base maps, typically at a scale of 1 inch to 2,000 feet. Earthquake Fault Zones vary in width, although they are often 0.75-mile wide. Once published, the maps are distributed to the affected cities, counties, and State agencies for their use in planning and controlling new or renewed construction. With the exception of single-family wood frame and steel frame dwellings that are not part of a larger development (i.e., four units or more), local agencies are required to regulate development within the mapped zones. In general, construction within 50 feet of an active fault zone is prohibited.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (PRC §§ 2690–2699.6), which was passed in 1990, addresses earthquake hazards other than surface fault rupture. These hazards include strong ground shaking, earthquake-induced landslides, liquefaction, or other ground failures. Much like the Alquist-Priolo Earthquake Fault Zoning Act discussed above, these seismic hazard zones are mapped by the State Geologist to assist local government in the land use planning process. The Seismic Hazards Mapping Act states, "it is necessary to identify and map seismic hazard zones in order for cities and counties to adequately prepare the safety element of their general plans and to encourage land use management policies and regulations to reduce and mitigate those hazards to protect public health and safety." The Seismic Hazards Mapping Act also states, "cities and counties shall require, prior to the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard."

California Building Standards Code

The State of California provides minimum standards for building design through the California Building Standards Code (CBC) (California Code of Regulations [CCR], Title 24). Where no other building codes apply, Chapter 29 regulates excavation, foundations, and retaining walls. The CBC applies to building design and construction in the State and is based on the federal Uniform Building Code (UBC) used widely throughout the country (generally adopted on a state-by-state or district-by-district basis). The CBC has been modified for California conditions with more detailed and/or more stringent regulations.

The State earthquake protection law (California Health and Safety Code § 19100 *et seq*.) requires that structures be designed to resist stresses produced by lateral forces caused by wind and earthquakes. Specific minimum seismic safety and structural design requirements are set forth in Chapter 16 of the CBC. The CBC identifies seismic factors that must be considered in structural design. Chapter 18 of the CBC regulates the excavation of foundations and retaining walls, and Appendix Chapter A33 regulates grading activities, including drainage and erosion control and construction on unstable soils, such as expansive soils and areas subject to liquefaction.

The CBC is updated every 3 years, and the current 2022 CBC took effect January 1, 2023. The 2022 CBC has been adopted by the City of Pleasanton as Title 20 of the Pleasanton Municipal Code (Municipal Code).

Local

City of Pleasanton

General Plan

The Pleasanton General Plan sets forth the following goals, policies, and programs related to geology and soils:

Safety Element

Goal 1 Minimize the risks to lives and property, and minimize the potential liability to the City due to seismic activity within the General Plan Area.

Policy 1 Restrict development in areas prone to seismic safety hazards.

Program 1.1 Comply with the Alquist-Priolo Act and other seismic safety criteria established by the City of Pleasanton.

Policy 2 Investigate the potential for seismic hazards during the development review process, and implement soils engineering and construction standards which minimize potential danger from earthquakes.

Program 2.1 Require site-specific soils, geologic, and/or geotechnical engineering studies prior to development approval of structures for human occupancy for any project proposed within areas shown on current Alquist-Priolo Earthquake Fault Zones Maps. For development within areas identified as severe through violent seismic shaking amplification (Figure 5-3: Relative Intensity of Ground Shaking) outside of the Alquist-

Priolo Earthquake Fault Zone, the site-specific soils and/or geotechnical report shall address the impacts of seismic ground shaking on proposed structures, infrastructure, and ground stability.

Program 2.2 Design and construct all structures to address potential seismic and geologic hazard conditions according to the California Building Standards Code (CBC) standards or more stringent standards. All structures and facilities not addressed by the CBC shall be designed and constructed to mitigate potential seismic and geologic hazards as recommended by site-specific soils, geologic, and/or geotechnical engineering studies.

Program 2.5 Require technical review and analysis of soils, geologic, and geotechnical studies by a qualified consulting engineering geologist reporting to the City of Pleasanton. Incorporate the recommendations of the City's consulting engineer into the project design.

Program 2.6 Require professional inspection of foundations, piers, excavation, earthwork, and other aspects of site development during construction. Ensure that all mitigations recommended by the City's consulting engineer are incorporated into the project construction.

Policy 3 Require post-earthquake construction, if needed, to conform to all City codes and ordinances.

Program 3.1 Require building permits and enforce all current building requirements and codes for post-earthquake construction.

Goal 2 Minimize the risks to lives and property, and minimize potential liability to the City, due to geologic hazards within the Plan Area.

Policy 5 Investigate the potential for geologic hazards as part of the development review process, and maintain this information for the public record.

Program 5.1 Require site-specific soils studies for all new development prior to the issuance of building permits and prior to the approval of final improvement plans. Where there is risk of geologic hazards, the soil study should address seismic shaking, lateral spreading, differential settlement, lurch cracking, liquefaction, erosion, and expansive soils.

Program 5.2 Require site-specific geologic and/or geotechnical engineering studies prior to development approval where there is risk of the following geologic hazards: surface fault rupture, bank failures, rock falls, landslides, and for areas with slopes equal to or greater than 20 percent.

Program 5.3 Require measures to mitigate potential geologic safety hazards during adverse conditions such as saturated soils and ground shaking, and during grading of the site

for roads, installation of infrastructure, and creation of building pads. Mitigation measures identified by the site engineering studies shall be incorporated into the project design.

Program 5.4 Require technical review and analysis of geotechnical studies by a qualified consulting Geotechnical Engineer reporting to the City. Incorporate the recommendations of the City's consulting engineer into the project design.

Program 5.5 Discourage development in areas with a high risk of geologic hazards as identified by a California licensed engineering geologist representing the City. Allow development only when geologic and soils investigations demonstrate that hazards can be mitigated by accepted engineering and construction techniques. Mitigation measures identified by the investigations shall be incorporated into the project design and subject to approval by the City's reviewing geologist/engineer.

Policy 6 Restrict new development of sites with structures intended for human occupancy in any landslide-prone or unstable area.

Program 6.1 Prohibit new development of sites with structures intended for human occupancy in any landslide-prone areas unless the landslide risk can be eliminated. Permit development in landslide prone areas only when sites can be shown to be stable during adverse conditions such as saturated soils, ground shaking, and during grading of the site for roads, installation of infrastructure, and creation of building pads. Engineering studies shall demonstrate that structures in landslide prone areas would sustain no more damage due to slope instabilities than damage sustained by a similar building in the Pleasanton Planning Area constructed to current CBC standards and located on soils with a low susceptibility to failure when exposed to moderate ground shaking.

Program 6.2 Require developers to include drainage, erosion, and landslide mitigation measures to reduce landslide potential.

Program 6.3 Design irrigation systems to minimize the potential for soil saturation, excessive runoff, and other factors deemed to contribute to slope instability.

Program 6.6 In unstable areas, prohibit major grading where existing slopes are 25 percent or greater.

Pleasanton Municipal Code

Section 9.14 of the Municipal Code, known as the Stormwater Management and Discharge Control Ordinance, establishes requirements for eliminating non-stormwater discharges to the municipal storm sewer, controlling the discharge to municipal storm sewers, separating storm sewers from spills, dumping or disposal of materials other than stormwater, and reducing pollutants in stormwater discharges to the maximum extent practicable.

3.6.4 - Methodology

Impacts related to geology and soils were determined by reviewing a variety of databases, web maps, the Updated Geotechnical and Geologic Report by Cornerstone Earth Group and Update Geotechnical Review provided by Ninyo and Moore which is provided in Appendix E. Information on existing soils on the project site was provided by the Updated Geotechnical and Geologic Report, the Update Geotechnical Review, and the Web Soil Survey from the United States Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS). Information on subsurface conditions including groundwater, subsidence, expansive, and collapsible soil were obtained by the Updated Geotechnical and Geologic Report and other supplemental resources from the California Department of Water Resources (CDWR), USGS, and the California Department of Transportation (Caltrans).

Information on seismic-related hazards was provided by the Updated Geotechnical and Geologic Report and Geotechnical Review. Further analysis was performed by evaluating web maps from the California Department of Conservation and CGS-provided web maps to determine whether the project site was delineated within a Special Study Zone under the Alquist-Priolo Fault Zoning Act, or other zones of required investigation for liquefaction or landslides. Details on the major fault lines in the region were evaluated through reviewing reports on fault segments from the Quaternary Fault and Fold Database of the United States.

The Assessment of the Paleontological Potential of Rock Units within the SVP Standard Guidelines was compared to the rock units underlaying the project site to determine the potential for uncovering significant paleontological resources during the construction phase of the proposed project. The UCMP Locality Search was utilized to identify vertebrate, invertebrate, plant, and microfossil localities uncovered in Alameda County that either were discovered in the same rock units situated on the project site or that were designated a locality name that matches the geography of the project area. In addition, a records search request was submitted to the UCMP on March 6, 2025, and completed on March 25, 2025, to obtain complete information on vertebrate and invertebrate localities uncovered in the Miocene-age rock units in the project region. The objective of the UCMP Locality Search and records search requests was to determine the potential of ground-disturbing activities during construction of the proposed project to uncover any significant paleontological resources.

3.6.5 - Thresholds of Significance

The lead agency utilizes the criteria in the California Environmental Quality Act (CEQA) Guidelines Appendix G Environmental Checklist to establish thresholds of significance to determine whether impacts to geology, soils, seismicity and paleontological resources are significant environmental effects. As such, the City has determined that the proposed project would have a potential impact if it would:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:
    i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on

other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

ii. Strong seismic ground shaking.

iii. Seismic-related ground failure, including liquefaction.

iv. Landslides.

b) Result in substantial soil erosion or the loss of topsoil.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

3.6.6 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the proposed project and provides mitigation measures where necessary.

Earthquakes

Impact GEO-1:	**The proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:** **i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.** **ii) Strong seismic ground shaking.** **iii) Seismic-related ground failure, including liquefaction.** **iv) Landslides.**

Impact Analysis

Construction and Operation

i) Fault Rupture

The project site is located in an area of high seismicity, as is all the San Francisco Bay Area. The project site is traversed by northwest trending fault lines with one subsidiary fault south of the project site. However, the fault lines on the project site cut through Tertiary rock units and do not transect Quaternary rock units younger than 11,000 years old. As such, the fault lines on the project site are considered inactive and are not designated within a Special Study Zone under the Alquist-Priolo Fault Zoning Act. The closest Special Study Zone is along the Calaveras Fault, which is

approximately 0.7 mile east and does not incorporate the project site. Since fault lines beneath the project site are considered inactive and the project site is not located within a Special Study Zone, impacts related to directly or indirectly causing loss, injury, or death involving fault rupture would be less than significant.

ii) Strong Ground Shaking

As previously mentioned, four major right lateral strike-slip faults part of the San Andreas Fault Zone are within 15 miles of the project site along with lesser-known faults. The Calaveras Fault, located approximately 0.7 mile east of the project site, is capable of generating an MMI VIII earthquake which is designated as very strong shaking that can damage buildings. In addition, the reoccurrence interval of the Southern Hayward segment of the Hayward Fault is approximately 150-205 years according to paleo seismic studies and the last maximum event occurred 157 years ago which produced a projected magnitude of 7.0 on the Richter Scale.

As such, development of the proposed project may expose new residents to an area prone to strong seismic shaking which could result in the direct or indirect loss, injury, or death of those inhabiting the project site in the future. However, the proposed project would be required to incorporate building design standards based on Sound Engineer judgment and minimum seismic design provisions by the CBC. The intent of the CBC provisions is to enable structures to (i) resist minor earthquakes without damage, (ii) resist major earthquakes without structural damage but with some nonstructural damage, and (iii) resist major earthquakes without collapse but with some structural as well as nonstructural damage. In addition, the proposed project would be required to meet the goals, policies, and programs related to strong seismic shaking in the General Plan such as Policy 2 which requires the implementation of soil engineering and construction standards to minimize strong seismic shaking, Program 2.1 requiring geotechnical engineering studies for developments within areas capable of experiencing severe to violent strong seismic shaking, and Program 5.1 which mandates site-specific soil studies for new developments to address seismic shaking prior to the issuance of building permits. Further, Program 2.2 supplements minimum seismic design provisions from the CBC by requiring the implementation of CBC standards into all structures to address seismic hazards. Since the proposed project would adhere to seismic design provisions by the CBC and other requirements in the General Plan, impacts related to the direct or indirect risk of loss, injury, or death involving strong seismic shaking would be less than significant.

iii) Ground Failure and Liquefaction

Subsurface conditions within the main development area of the project site include residual and colluvium comprised of a thin layer of clay overlaying sedimentary bedrock with no groundwater present between three to 18 feet below the surface. As previously mentioned, soils susceptible to liquefaction are loose and saturated unconsolidated sands with a shallow water table. Based on the findings of the Updated Geotechnical and Geologic Report, the main development area and areas of higher elevation on the project site have a low liquefaction potential. While the project has been designed to avoid development within Liquefaction Zones, both the southeastern boundary of the project site and northeastern portion of the project site, which would redevelop two existing single-family homes, are located within a designated as a Liquefaction Zone of Required Investigation by

the CGS.[23] Additionally, younger alluvium consisting of sands and gravels with perched groundwater are positioned along Devany Creek along the southeastern portion of the project site.

Accordingly, the Updated Geotechnical and Geologic Report indicates the southeastern and northeastern boundaries of the project site to have a moderate to high liquefaction potential. Therefore, development within these areas of the project site could result in potentially significant impacts related to direct or indirect loss, injury, or death involving liquefaction generated from strong seismic shaking may be potentially significant. As provided above, the proposed project would be required to demonstrate compliance with General Plan policies and programs, including but not limited to Program 5.1 and 5.2 which require site-specific studies or geotechnical engineering studies. Further, the Updated Geotechnical and Geologic Report and recommends future developments constructed in these areas to implement design features to resist liquefaction-induced settlement.

Therefore, prior to obtaining any grading or building permits, the proposed project would implement Mitigation Measure (MM) GEO-1 by hiring a qualified Geotechnical Engineer to prepare a design-level geotechnical investigation and review existing structural, civil, and landscaping plans. The qualified Geotechnical Engineer would present additional findings on any seismic-related hazards, including liquefaction, on the project site and would provide recommendations that would be required to be incorporated into the design of the proposed structures prior to the issuance of any grading or building permits. With implementation of MM GEO-1, the proposed project would not be susceptible to the risk of injury, loss, or death involving seismic-induced ground failure such as liquefaction.

iv) Landslides

The project site is situated on complex topography with moderately steep to steep hillsides ranging from 774 feet in elevation AMSL on the western portion of the project site that slopes downward to the east, decreasing in elevation to approximately 438 feet AMSL along Devany Creek. The Updated Geotechnical and Geologic Report identified three small-scale drainage swales with eroded side slopes filled with colluvium on the southeastern aspect of the project site that drains into Devany Creek. The colluvium-filled swales were discovered to be the result of seasonal pervasive downhill creep of the colluvial soils. The northern portion of the project site was previously mapped having a large landslide that extends north beyond Dublin Canyon Road, but further analysis indicated that the topography associated with the northern portion of the project site is related to erosional processes rather than a large landslide.[24]

The Updated Geotechnical and Geologic Report concludes that while a majority of natural slopes located on the project site are relatively stable, the proposed cuts proposed during future grading could affect the stability of finished slopes. This could result in a potentially significant impact related

[23] California Department of Conservation. 2025. California Geologic Survey Seismic Hazards Program: Liquefaction Zones Map. Website: https://gis.data.cnra.ca.gov/datasets/cadoc::cgs-seismic-hazards-program-liquefaction-zones/explore?location=37.696002%2C-121.952585%2C15.87. Accessed May 1, 2025.

[24] Cornerstone Earth Group. 2020. Updated Preliminary Geotechnical and Geologic Report. March 31.

to the direct or indirect loss, injury, or death involving landslides induced from strong seismic shaking.

The implementation of Mitigation Measure (MM) GEO-1 would require a design-level geotechnical investigation and the review of the proposed project's detailed structural, civil, and landscaping plans by a qualified Geotechnical Engineer prior to the issuance of any grading or building permits to ensure required recommendations are incorporated into the design. The qualified Geotechnical Engineer would provide additional findings on any seismic or subsurface hazards that could directly or indirectly result in the destruction to property or risk the injury or death of individuals residing on the project site, including landslide hazards, and shall provide comments and recommendations on any design measures that would be required to be incorporated into the proposed project to reduce impacts related to landslides. Implementation of MM GEO-1 would require City verification of the incorporation of recommended design features by the qualified Geotechnical Engineer prior to the issuance of any building or grading permits. With MM GEO-1, the proposed project would not directly or indirectly generate the risk of loss, injury, or death involving seismically induced landslides.

Level of Significance Before Mitigation

Potentially significant impact.

Mitigation Measures

MM GEO-1 Design-level Geotechnical Study

Prior to the issuance of any building or grading permits, a design-level geotechnical investigation on the project site and review of detailed site plans shall be performed by a qualified Geotechnical Engineer. The design-level geotechnical investigation could incorporate a variety of field methods and would include (but not be limited to) the following items:

- Evaluating the lateral extent and depth of colluvial soils.
- Performing a seismic refraction survey to determine shear wave velocities at deeper depths.
- Analyzing and developing slope grading and engineered buttress fill design criteria.
- Evaluating upslope sources of water.
- Evaluating the Site Classification for Seismic Design.
- Estimating appropriate minimum building setbacks from the face of fill slopes.

The qualified Geotechnical Engineer would be required to demonstrate that implementation of the recommendations would reduce potential impacts associated with liquefaction and landslide potential to below a level of significance in conformance with the standards in the California Building Standards Code (CBC). The applicant would be required to incorporate all recommended design features into project building plans, for review and approval by the City Engineer prior to the issuance of any building or grading permits.

Level of Significance After Mitigation

Less than significant impact.

Soil Erosion or Topsoil Loss

Impact GEO-2: The proposed project would not result in substantial soil erosion or the loss of topsoil.

Impact Analysis

Construction

The proposed project would involve grading, building construction, paving, and utility installation activities that would expose soils and could result in erosion and sedimentation. Left unabated, the accumulation of sediment in downstream waterways such as Devany Creek or the Municipal Separate Storm Sewer System (MS4) could result in the blockage of flows, potentially causing increased localized ponding or flooding, and may increase the turbidity of receiving waters. However, the proposed project would be required to comply with Municipal Code Section 9.14 which requires construction projects to conform to the C.6 Construction Site Control Requirements in the San Francisco Bay Regional Water Quality Control Board's (RWQCB) Municipal Regional Stormwater NPDES permit (MRP) (Order No. R2-2022-1108; NPDES Permit No. CAS612008). The C.6 Construction Site Control Requirements mandates construction projects that disturb more than one acre of land to file a Notice of Intent (NOI) and prepare an erosion/pollution control plan or SWPPP to obtain a Construction Stormwater General Permit. The SWPPP or erosion control plan will identify site-specific BMPs that will implement erosion, run-on and runoff, and sediment control measures to prevent the discharge of sediments.

Under Municipal Code Section 9.14 and the C.6 Construction Site Control Requirements, no construction permits shall be issued, or any construction activities shall begin until the submittal of a NOI, City review of the SWPPP or applicable erosion control plan to ensure compliance with local regulations, and installation of site-specific BMPs. Since the proposed project would be required to comply with Municipal Code Section 9.14 which conforms to the C.6 Construction Site Control Requirements under the RWQCB NPDES permit before any construction activity can be implemented, impacts from construction activities on the project site would not result in substantial soil erosion or the loss of topsoil. Therefore, constructed-related impacts to soil erosion and loss of topsoil would be less than significant.

Operation

The proposed project would introduce new impervious surfaces and would involve the cutting of existing surfaces on the project site for the development of the proposed structures. The introduction of new impervious surfaces and exposure of hillsides could alter the natural drainage patterns on the project site, potentially exacerbating soil erosion during operation of the proposed project. However, the proposed project would be required to comply with Municipal Code Section 9.14 where new development projects are required to conform to MRP Provision C.3, New and Redevelopment Standards. Under MRP Provision C.3, new development projects that create 10,000 square feet or more of impervious surfaces must implement Low Impact Development (LID) source control, site design, and stormwater treatment on-site or at a joint stormwater treatment facility to

minimize runoff and maintain a site's predevelopment hydrology through minimizing disturbed areas and then infiltrating, storing, detaining, or biotreating stormwater runoff close to the source.

In compliance with Municipal Code Section 9.14 which conforms to MRP Provision C.3 requirements, the proposed project would develop on-site bioretention areas where runoff from introduced impervious surfaces from driveways, sidewalks, roadways, and roofs would flow into proposed storm drains that would connect to vegetated areas consisting of proposed bioretention areas to reduce the rate of runoff and to treat stormwater before flowing into the City's existing storm drainage system. In addition, the proposed project would limit the disturbance of natural drainage systems through preserving natural areas by dedicating approximately 116.8 acres for open space use managed by the future Homeowner's Association (HOA) and EBRPD. Since the proposed project would comply with Municipal Code Section 9.14 through the development of on-site bioretention areas and would dedicate land use for open space preventing alteration of existing natural drainage features, operation of the proposed project would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant.

Level of Significance

Less than significant impact.

Unstable Geologic Location

Impact GEO-3:	**The proposed project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.**

Impact Analysis

A majority of the project site, including the development area identified within the limits of grading, is underlain by a thin layer of colluvium and residual soil with stiff clays and no groundwater indicating a low potential for liquefaction in the main development area. However, as previously mentioned above, some areas within the northern and western portions of the project site are designated as Landslide Zones of Required Investigation by the CGS. Additionally, the northwestern and southeastern portions of the project site, especially along Devany Creek, have higher potential for liquefaction and are within a CGS Zone of Required Investigation for liquefaction. Since the northern and southeastern sections of the project site have topographic and subsurface conditions indicating potential for landslides and liquefaction, additional loading from the development of structures along the northern and southeastern portions of the project site may result in soils becoming unstable and could induce landslides or liquefaction. As such, impacts related to new developments being situated on unstable geologic units or soils that could engender landslides or liquefaction may be potentially significant.

Areas susceptible to lateral spreading are situated on near horizontal slopes with subsurface conditions comprising of a cohesive layer on the upper portions of the soil profile overlaying loose and saturated sediments. The thin colluvium and residual soils associated with the main development area are situated above marine sedimentary rocks comprised of sandstone, siltstone, and siliceous shale. As such, the subsurface conditions in the main development area have a low

potential to induce lateral spreading from development of the proposed project. However, the younger alluvium soils composed of sands and gravels on the southeastern portion of the project site are deposited toward a free face being the Devany Creek channel which may be susceptible to lateral spreading. However, no development or grading is proposed within the southeastern portion of the project site and impacts would be less than significant.

As previously mentioned, soils highly susceptible to subsidence include clays and silts that have expansive properties and fluctuate in moisture content seasonally. The project site is situated on the Diablo clay series and Millsholm silt loam series where both soil series consist of a clayey and silty texture and are known to fluctuate in moisture content seasonally, especially the Diablo clay series which contains cracks during the dry season that close in the wet season. In addition, the Updated Geotechnical and Geologic Report identified colluvium and residual soils comprised of clays to be situated within the main development area. Although the proposed project is situated on soils that could be susceptible to subsidence, the proposed project would connect to the existing water main underneath Dublin Canyon Road and would not extract groundwater as a source of potable water or irrigational uses. In addition, the proposed project is not located within an area of existing land subsidence. As such, impacts related to soils becoming unstable from development resulting in subsidence would be less than significant.

The project site is underlain by colluvium and residual soil comprised of a clayey texture. As previously discussed, naturally occurring collapsible soil consists of sand and silt sized particles held together by clayey material that is naturally present in alluvial and colluvial deposits or residual soils in semi-arid environments that can be shallow or deep. As such, soils on the project site contain characteristics of collapsible soil where additional wetting could occur naturally from the infiltration of rainwater, or from the development of the proposed project including a leakage from installed water lines and BMPs from construction. Furthermore, additional loading from developed structures can cause the rearrangement of particles and a reduction in void ratio, causing compression leading to collapse. Since the main development area of the project site consists of colluvium and residual soil composed of clays that are indicators of collapsible soils, additional loading from the development of residential units, or additional wetting from construction activities or natural processes could result in collapse.

Overall, surface and subsurface conditions on the project site indicate potentially significant impacts related to landslides, liquefaction, and collapse if not engineered properly. These conditions likely vary in different areas on the project site, as specified above. However, the implementation of MM GEO-1 would require a design-level geotechnical investigation and a review of the proposed project's structural, civil, and landscaping plans by a qualified Geotechnical Engineer prior to the issuance of any grading or building permits. The qualified Geotechnical Engineer would perform a variety of on-site and laboratory tests on the soil properties situated on the project site including, but not limited to boring, trenching, and in situ standard-penetration tests. The qualified Geotechnical Engineer would provide recommendations in site plans and design features that would be incorporated into the project grading and building plans to reduce potential impacts associated with unstable soil conditions, in accordance with the CBC. The City Engineer would review and approve the plans and verify incorporation of recommendations prior to issuance of a grading or building permit. With MM GEO-1, the proposed project would not be located on a geologic unit or soil that would become

unstable with the development of the proposed project. Impacts related to being located on an unstable geologic unit or soil would be less than significant with mitigation incorporated.

Level of Significance Before Mitigation

Potentially significant impact.

Mitigation Measures

Implement MM GEO-1.

Level of Significance After Mitigation

Less than significant impact.

Expansive Soil

Impact GEO-4:	**The proposed project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.**

Impact Analysis

As previously discussed, expansive soils are characterized as soils with a clayey texture that have shrink and swell potential when undergoing fluctuations in moisture content that shrink when dried and expand when wet. The main development areas associated with the central and eastern portions of the project site away from Devany Creek consist of the Diablo clay series which have expansive capabilities that undergo changes in moisture content due to California's Mediterranean climate seasonally fluctuating from hot dry summers, to cool moist winters. In addition, colluvial and residual soils comprised of stiff clays range from an approximate depth between 2-11 feet below the surface, but many vary throughout the project site. Previous plasticity index tests performed on surficial clays on the project site at one to three feet in depth indicated moderate to high plasticity suggesting that soils are capable of undergoing deformation without fracturing, being a measure of having moderate to high expansive potential. Since the soil series on the project site consists of Diablo clays that have expansive capabilities, the region is associated with a Mediterranean climate, and previous plasticity index tests determined clays to have moderate to high plasticity, the proposed project may have a potentially significant impact related to creating substantial direct or indirect risk to life or property due to being located on expansive soils.

The Updated Geotechnical and Geological Report provides recommendations to reduce the expansive capabilities of the colluvial soil on the project site. The implementation of MM GEO-1 would require a design-level geotechnical investigation and a review of the proposed project's structural, civil, and landscaping plans by a qualified Geotechnical Engineer prior to the issuance of grading or building permits. The qualified Geotechnical Engineer would perform a variety of tests to indicate the expansive capabilities of the colluvium on the project site including, but not limited to, conducting an Atterberg Limits Test to investigate the fluctuations in moisture content of the colluvium soils such as calculating the plasticity index, the shrinkage limit, or the activity number. The qualified Geotechnical Engineer would provide appropriate recommendations for structure foundations and pavements that would be incorporated into the proposed project grading and

building plans to reduce the impacts of expansive soils, in accordance with the CBC. The City Engineer would review and approve the plans prior to issuance of a grading or building permit. With MM GEO-1, the proposed project would not create a substantial risk to life or property from being located on expansive soils and impacts related to expansive soils would be less than significant with mitigation incorporated.

Level of Significance Before Mitigation

Potentially significant impact.

Mitigation Measures

Implement MM GEO-1.

Level of Significance After Mitigation

Less than significant impact.

Wastewater Disposal Systems

Impact GEO-5:	**The proposed project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.**

Impact Analysis

The proposed project is located within the City of Pleasanton. Wastewater infrastructure would be installed along the proposed internal roadways throughout the residential portions of the project site consisting of eight-inch sanitary sewer laterals that would directly connect to eight-inch sanitary sewer laterals underneath Dublin Canyon Road to the north. In addition, stormwater infrastructure would consist of storm drains along internal roadways that would transfer stormwater to three on-site bioretention areas for treatment before connecting to the City's existing storm drainage system. Since the proposed project would connect to already available wastewater and stormwater systems, no septic tanks or alternative wastewater disposal systems would be installed. Therefore, no direct, indirect or cumulative impact related to soil capability of supporting the use of septic tanks or alternative wastewater disposal would occur.

Level of Significance

No impact.

Destruction of Paleontological Resource or Unique Geologic Feature

Impact GEO-6:	**The proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.**

Impact Analysis

Construction activities associated with the project site include ground-disturbing activities such as grading, trenching, and cutting and filling. The project site is located on colluvium and residual soils at the surface with marine sedimentary bedrock of Miocene-age comprised of sandstone, siltstone, and siliceous shale in the subsurface that are associated with the Claremont member of the

Monterey Formation (Tm) and an unnamed Miocene siltstone and clay shale (Tmc) formation. In addition, the UCMP Locality Search Online Database and records search conducted on March 25, 2025, did not identify any fossil localities within the project boundaries. However, vertebrate and invertebrate fossil localities have been uncovered within both the Claremont Shale member (or Formation) and the Monterey Formation (or Group) (Tm) in proximity to the project site and in the surrounding region. Although surficial deposits on most of the project site consist of colluvium and residual soils ranging from approximately 2-11 feet in depth, which have low paleontological potential, subsurface conditions also consist of high paleontological potential rock units from the Claremont Shale member (or Formation) and the Monterey Formation (Group) that have been associated with vertebrate and invertebrate localities in the geographic region. As such, excavations that intrude into the Claremont shale and Monterey formations (i.e., generally below 2 feet) during construction of the proposed project may directly or indirectly destroy a unique paleontological resource. This would constitute a significant adverse impact on paleontological resources.

Thus, implementation of MM GEO-2a through GEO-2d would include the provisions required for the protection and recovery of paleontological resources. As such, with the implementation of MM GEO-2a through GEO-2d, impacts related to damaging unique paleontological resources would be reduced to less than significant.

Operation

Potential impacts to paleontological resources are limited to the construction phase. No operational impacts are anticipated.

Level of Significance Before Mitigation

Potentially significant impact.

Mitigation Measures

MM GEO-2a Prior to the issuance of grading permits, the project proponent/developer shall demonstrate the retention of the services of a qualified professional Paleontologist as defined by the Society of Vertebrate Paleontology (SVP). The qualified Paleontologist shall prepare a Paleontological Resource Impact Mitigation Monitoring Program (PRIMMP). The project proponent/developer shall submit the PRIMMP to and receive approval from the City/Lead Agency. The PRIMMP will describe, in addition to industry standards and SVP standards, the level of monitoring required in the project area, qualifications of the Paleontological monitor for grading operations, and identification of personnel with authority and responsibility to temporarily halt or divert grading equipment to allow for recovery of large specimens. Furthermore, the PRIMMP shall provide direction for any fossil discoveries to be immediately reported, means and methods to be employed to quickly salvage fossils as they are unearthed to avoid construction delays, sampling procedures and protocol for collecting and processing sediments and specimens, fossil identification, and reporting and curation procedures to be employed. The report will include the paleontological records search conducted at the UCMP, pertinent exhibits, maps and reference procedures for reporting of findings.

MM GEO-2b On the first day of ground disturbance and prior to the start of any ground-disturbing activities, the qualified professional Paleontologist that meets SVP Standard Procedures shall prepare and conduct a project-wide Worker Environmental Awareness Program (WEAP) training. The WEAP training shall include a review of applicable federal, State, and local regulations related to paleontological resources; recognition and understanding of significant paleontological resources pertinent to the geography and geology of the region and the types of paleontological resources that may be encountered; procedures to be followed in the event that such resources are encountered; the protocols that apply in the event of inadvertent discovery, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated and any other appropriate protocols. In the event construction crews are phased in, additional training will be conducted for new construction personnel.

MM GEO-2c During ground-disturbing construction activities, full time paleontological monitoring shall be conducted by a qualified Paleontological Resource Monitor meeting SVP standards and best practices, under the supervision of the Principal Paleontologist. Monitoring shall be restricted to areas that intrude into the Claremont shale and Monterey formations (i.e., generally below 2 feet) and undisturbed subsurface areas of marine sedimentary rock units of Miocene-age. In the event potentially significant paleontological resources are encountered during ground-disturbing activities, construction-related activities within 50 feet of the find shall stop. No excavation or other disturbances shall occur within the buffer zone until the find has been evaluated by the project Paleontologist. The Paleontologist shall collect samples of sediments which are likely to contain the remains of small fossil invertebrates, vertebrates, or microfossils. If the resources are found to be significant, protocol for collecting and processing sediments and specimens, as outlined in the Paleontological Resource Impact Mitigation Monitoring Program (PRIMMP), is to be implemented. The Paleontologist shall have the power to temporarily halt or divert grading equipment to allow for removal of abundant or large specimens. If no significant specimens are encountered during ground-disturbing activities, full time monitoring can be reduced to spot-checking or suspended entirely, at the discretion of the qualified professional Paleontologist and the City/Lead Agency.

MM GEO-2d The Paleontological Monitor shall keep a daily log and photographic record of all activities involving ground disturbance during the construction phase, as well adhering to the procedures outlined in the Paleontological Resource Impact Mitigation Monitoring Program (PRIMMP). The Monitor's daily activities, findings, etc. shall be submitted to the Principal Paleontologist. All relevant details and findings shall be summarized in a report that shall be prepared at the completion of ground-disturbing activities and submitted to the City/Lead Agency and UCMP repository. Additionally, specimens shall be identified and curated into a permanent accredited repository (such as the University of California Museum of Paleontology [UCMP]) with permanent curation and retrievable storage.

Level of Significance After Mitigation

Less than significant impact.

3.6.7 - Cumulative Impacts

This analysis evaluates whether the impacts of the proposed project, together with the impacts of cumulative development, could result in a cumulatively significant impact with respect to geology and soils. This analysis also considers whether incremental contribution of impacts associated with the implementation of the proposed project would be significant. If both conditions apply, this analysis will then evaluate feasible cumulative mitigation that would reduce cumulative effects. If one or both conditions do not apply, cumulative impacts would be less than significant, and no cumulative mitigation is necessary. If there is no impact associated with respect to a particular CEQA threshold, the proposed project would have no contribution to potential cumulative impacts, and therefore, further discussion of cumulative impacts is not required.

The geographic scope of the cumulative analysis related to geology and soils includes projects listed in Table 3-1: Cumulative Projects that are in the City of Pleasanton's jurisdiction within a 0.5-mile radius of the proposed project, as impacts related to geology and soils tend to be localized. Since the proposed project is situated on the outskirts of the City, only one cumulative project is located within an 0.5-mile radius of the proposed project, being the Greek Orthodox Church Project that is approximately 0.45 mile north of the project site.

Seismic-related Hazards

As previously mentioned, impacts related to geology and soils tend to be site-specific, therefore the relevant geographic scope is limited to the 0.5-mile radius of the proposed project site. The only cumulative project within an 0.5-mile radius of the proposed project is the Greek Orthodox Church Project. Both the proposed project and the Greek Orthodox Church Project are located on the same geologic units and have the same approximate distance from the identified major fault lines. As such, neither project is located in a Special Study Area defined under the Alquist-Priolo Earthquake Fault Zoning Act. Although both the proposed project and Greek Orthodox Church Project may be susceptible to strong seismic shaking, both projects would be required to follow the same seismic safety and structural design requirements from the CBC, and goals, policies, and programs within the General Plan such as Policy 2, Program 2.1, 2.2, and 5.1. In addition, the main development area within the project site that is not located in proximity to Devany Creek has a low liquefaction potential. The Web Soil Survey from the USDA NRCS indicates the Greek Orthodox Church Project to be underlain by the Diablo clay series which consists of soils with a cohesive texture and not unconsolidated saturated sands that are associated with liquefaction, and the Greek Orthodox Church Project is neither in a Liquefaction Zone or Landslide Zone of Required Investigation as delineated by the CGS. As such, the Greek Orthodox Church Project's cumulatively considerable impact in concurrence with the proposed project related to seismically induced liquefaction and landslides would have a less than cumulatively considerable impact. Overall, since both the proposed project and Greek Orthodox Church Project are not located in a Special Study Area, both projects would be required to incorporate minimum CBC standards and General Plan goals and policies, and the Greek Orthodox Church Project is not located in a Liquefaction or Landslide Zone of

Required Investigation, cumulative impacts would be less than significant. Additionally, as described above, the proposed project's incremental contribution to the less than significant cumulative impact related to seismic-related hazards would be less than cumulatively considerable.

Soil-related Hazards

The Greek Orthodox Church Project is within the geographic scope for this cumulative analysis and would likely implement construction activities such as grading, trenching, and filling that could exacerbate soil erosion. If the Greek Orthodox Church Project disturbs at least one acre of land, the Greek Orthodox Church Project, similar to the proposed project, would be required to abide by Municipal Code Section 9.14 which conforms to C.6 Construction Site Control Requirements in the RWQCB NPDES permit (Order No. R2-2022-1108; NPDES Permit No. CAS612008) by submitting a NOI to the City, and would prepare an erosion/pollution control plan or SWPPP to obtain a Construction Stormwater General Permit. The erosion/pollution control plan or SWPPP would identify and implement site-suitable BMPs that would implement erosion and sediment control measures during construction activities. As previously mentioned, the Greek Orthodox Church Project is not delineated in a Landslide or Liquefaction Zone of Required Investigation by the CGS. Accordingly, cumulative impacts related to landslides or liquefaction would be less than significant. Furthermore, soil-related hazards such as lateral spreading, collapse, subsidence, and expansive soils are site specific, and both projects are in direct proximity to the City's existing water lines, sewer lines, and stormwater drains and would not require the installation of septic tanks or other alternative wastewater disposal systems. Since both projects would be required to implement site-specific erosion control measures through BMPs, soil-related hazards are site-specific, and are in proximity to the City's water lines. Therefore, cumulative impacts would be less than significant. Moreover, as discussed above, the proposed project's incremental contribution to less than significant cumulative impacts would not be cumulatively considerable. Impacts related to soil hazards would be less than significant, and the proposed project's incremental contribution would be less than significant.

Paleontological Resources

Potential cumulative impacts to paleontological resources are limited to construction. As discussed above, the Greek Orthodox Church Project is the only cumulative project within an 0.5-mile radius from the project site and is considered in the geographic scope for this cumulative analysis. Because of being in relative proximity to each other, both the proposed project and the Greek Orthodox Church Project are likely situated on the same Miocene sedimentary rocks comprised of sandstone, siltstone, and siliceous shale. As previously mentioned, rock units with high paleontological potential consist of sedimentary rock units such as argillaceous and carbonate-rich paleosols and fine-grained marine sandstones. As such, ground-disturbing activities during the construction phase of each project have the potential to unintentionally uncover and disturb significant paleontological resources on-site. Because of the site-specific nature of potential impacts, the potential for cumulative impacts is limited. However, both the proposed project and the Greek Orthodox Church Project would be required to abide by the same applicable federal, State, and local rules and regulations governing the preservation, recovery, and curation of significant paleontological resources and would implement mitigation measures identified as necessary regarding the potential of uncovering such resources. In addition, the discovery of significant paleontological resources is site-specific and any unintentional discovery from construction activities would not directly

exacerbate any impacts to undisturbed paleontological resources in the surrounding area. The proposed project and the Greek Orthodox Church Project would be required to comply with the same federal, State, and local rules and regulations pertaining to the preservation and recovery of paleontological resources, would implement mitigation measures if deemed necessary to avoid and reduce damage to paleontological resources, and the uncovering of paleontological resources tend to be site-specific. Therefore, the cumulative impact related to directly or indirectly destroying a paleontological resource or unique geologic feature would be less than significant and the proposed project's incremental contribution would be less than significant.

Level of Cumulative Significance Before Mitigation

Less than significant impact.

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3.7 - Greenhouse Gas Emissions

3.7.1 - Introduction

This section describes existing climate conditions as well as the relevant regulatory framework. The "Environmental Setting" provides a description of greenhouse gases (GHGs) and the current state of the climate. The "Regulatory Framework" provides a description of relevant federal, State and local regulatory policies that serve to reduce GHG emissions and are applicable to the proposed project.

3.7.2 - Environmental Setting

The Earth's temperature is rising,[1] and although the global climate has varied over the long-range time scale, there is strong scientific consensus that the rapid heating in recent decades is both unusual and caused by emissions of GHGs from human activities such as the burning of fossil fuels, including coal and oil.[2] Gases that trap heat in the atmosphere are referred to as GHGs. The effect is analogous to the way a greenhouse retains heat. Prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons, chlorofluorocarbons, and sulfur hexafluoride. Atmospheric concentrations of CO_2, the most prominent GHG, have been increasing rapidly in recent decades, from approximately 280 parts per million (ppm) before the start of the Industrial Revolution in the 1760s to more than 400 ppm as of 2013.[3] According to the United Nations Intergovernmental Panel on Climate Change (IPCC), it is *extremely unlikely* that global climate change of the past 50 years can be explained without the contribution from human activities.

As the concentration of gases continues to increase in the atmosphere, the earth's temperature has increased by about 1.2 to 1.4°F (degrees Fahrenheit) since 1900.[4] Even if GHG emissions could be reduced to zero overnight, global temperatures will continue to rise in future years due to the build-up of GHGs that have already accumulated in the atmosphere and the oceans. As future emissions increase the atmospheric concentrations of CO_2 and other GHGs, the impacts of the warming greenhouse effect are projected to steadily worsen.

Global climate change is not confined to a particular project area and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough GHG emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact. Therefore, this section discusses the proposed project's contribution to the cumulative GHG impact.

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1 National Centers for Environmental Information, National Oceanic and Atmospheric Administration (NOAA). 2024. Website: https://www.ncei.noaa.gov/access/monitoring/climate-at-a-glance/global/time-series. Accessed March 6, 2025.

2 K. Myers et al. "Consensus revisited: quantifying scientific agreement on climate change and climate expertise among Earth scientists 10 years later." Environmental Research Letters, Vol.16 No. 10, 104030 (20 October 2021). doi: 10.1088/1748-9326/ac2774.

3 Global Monitoring Library, National Oceanic and Atmospheric Administration (NOAA). 2024. Website: https://gml.noaa.gov/ccgg/trends/. Accessed March 6, 2025.

4 National Aeronautics and Space Administration (NASA). 2024. World of Change: Global Temperatures. Website: https://earthobservatory.nasa.gov/world-of-change/global-temperatures. Accessed March 6, 2025.

3.7.3 - Greenhouse Gases

Unlike emissions of criteria and toxic air pollutants, which have local or regional impacts, emissions of GHGs that contribute to global warming or global climate change have a broader, global impact. Global warming is a process whereby GHGs accumulating in the atmosphere contribute to an increase in the temperature of the earth's atmosphere. The principal GHGs contributing to global warming are CO_2, CH_4, N_2O, and fluorinated gases. The primary GHGs of concern are summarized in Table 3.7-1. These gases allow visible and ultraviolet light from the sun to pass through the atmosphere, but they prevent heat from escaping back out into space.

Table 3.7-1: Description of Greenhouse Gases of Concern

Greenhouse Gas	Description and Sources and (Sinks)	Atmospheric Lifetime	Percent of US Emissions
Carbon Dioxide (CO_2)	• Fossil fuel combustion • Forest clearing • Cement production • (Plants)	50-200	79.7
Methane (CH_4)	• Livestock • Landfills • Leaks from oil and natural gas production	12	11.1
Nitrous Oxide (N_2O)	• Fertilizers • Manure • Fossil Fuel Combustion • Nylon production • Semiconductor Manufacturing • Wastewater treatment	114	6.1
Hydrofluorocarbons (HFCs)	• Automobile air conditioners • Refrigerants	1-50,000	3.1
Perfluorocarbons (PFCs)	• Primary aluminum production • Semiconductor manufacturing	10,000-50,000	
Sulfur hexafluoride (SF_6)	• Electrical power transmission equipment • Magnesium industry • Semiconductor manufacturing	3,200	
Nitrogen trifluoride (NF_3)	• Electronics manufacture for semiconductors and liquid crystal displays	740	
Source: United States Environmental Protection Agency (EPA). April 11, 2024. Website: https://www.epa.gov/ghgemissions/overviewgreenhouse-gases. Accessed October 13, 2024.			

California Greenhouse Gas Emissions Inventory

Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the transportation, industrial/manufacturing, utility, residential, commercial, and agricultural sectors. Emissions of CO_2 are byproducts of fossil fuel combustion. Methane, a highly potent GHG, results from off-gassing (the release of chemicals from nonmetallic substances under ambient or greater pressure conditions) is largely associated with agricultural practices and landfills. N_2O is also largely attributable to agricultural practices and soil management. CO_2 sinks, or reservoirs, include vegetation and the ocean, which absorb CO_2 through sequestration and dissolution, respectively.

As the second largest emitter of GHG emissions in the United States, California contributes a large quantity (381.3 million metric tons [MMT] carbon dioxide equivalent [CO_2e] in 2021) of GHG emissions to the atmosphere.[5] Anthropogenic CO_2 are largely byproducts of fossil fuel combustion and are attributable to transportation, industry/ manufacturing, electricity generation, natural gas consumption, and agriculture processes.

Statewide Climate Impacts

Even if GHG emissions could be reduced to zero overnight, global temperatures will continue to rise in future years due to the build-up of GHGs that have already accumulated in the atmosphere and the oceans. As future emissions increase the atmospheric concentrations of CO_2 and other GHGs, the impacts of the warming greenhouse effect are projected to steadily worsen.

These impacts—including substantially higher temperatures, more extreme weather, increased wildfire events and sea level rise–are already being experienced in California today. As reported by the California Natural Resources Agency in 2009, despite annual variations in weather patterns, California has seen a trend of increased average temperatures, more extreme hot days, fewer cold nights, longer growing seasons, less winter snow, and earlier snowmelt and rainwater runoff. Statewide average temperatures increased by about 1.7°F from 1895 to 2011, and a larger proportion of total precipitation is falling as rain instead of snow. Sea level rose by as much as 7 inches along the California coast over the last century, leading to increased erosion and adding pressure to the State's infrastructure, water supplies, and natural resources. Within the past decade, California has experienced some of the most extreme climate events in its recorded history—a severe 4-year drought, a dramatic reduction in Sierra Nevada winter snowpack, five of the State's 20 largest forest fires since 1932, and 2 years back-to-back of the hottest recorded average temperatures.

Local and Regional Climate Impacts

The San Francisco Bay Area has experienced similar trends as California. Averaged across the region, mean annual temperature has increased nearly 1°F in the last 30 years over the previous 30-year period.

[5] California Air Resources Board (ARB). 2021. Current California GHG Emission Inventory Data. Website: https://ww2.arb.ca.gov/ghg-inventory-data. Accessed March 6, 2025.

These observed trends in the San Francisco Bay Area are anticipated to continue in the future:

- **Temperatures are projected to rise substantially, and more extreme hot days will occur.** By 2050, Bay Area annual average temperatures are projected to increase by an additional 2.7°F in the absence of actions to reduce GHG emissions. The number of very hot days and severe heat waves are projected to more than double across the region by midcentury.
- **More precipitation extremes, more rain, and less snow.** The Sierra Nevada region has experienced some of the wettest and driest years in more than 100 years of record keeping. The Sierra Nevada is also the source of much of the Bay Area's water supply, which is typically stored as snow melt rather than water, posing challenges to water storage and distribution, particularly during the longer fire seasons.
- **Sea level rise.** Sea level at the Golden Gate Bridge has risen 8 inches over the last 100 years, creating implications on coastal flooding, erosion, and related damages.
- **Increased frequency of wildfires.** Higher temperatures, higher winds and drought are fueling wildfires across the Bay Area and California, while also lengthening the wildfire season. Wildfires can cause dramatic short-term spikes in air pollution levels and emit massive quantities of CO2 and black carbon (a short-lived GHG), along with other pollutants.
- **Exacerbation of air quality problems and impacts on public health.** The number of days with high ozone levels correlates closely with the years when the Bay Area experiences more extreme-heat days. Higher ozone levels due may increase negative health impacts such as acute respiratory symptoms, lost school days, and even premature death. In addition, heat-related deaths and illnesses are anticipated to rise and urban heat island impacts will grow. Higher temperatures will increase vector-borne diseases and produce more plant pollen and lengthen allergy seasons.
- **Higher temperatures exacerbate pollution from cars and industry.** Higher temperatures increase the use of air conditioners in buildings and cars, which in turn requires more combustion of fossil fuels, resulting in increased levels of ozone precursors, particulates, toxic air contaminants (TACs), and GHGs.

While the impacts are felt locally, climate change is a global issue because GHGs are global pollutants. Pollutants with localized air quality effects, including criteria air pollutants and TACs, have relatively short atmospheric lifetimes (approximately 1 day) and generally do not travel greatly beyond their point of emission. By contrast, GHGs have long atmospheric lifetimes, ranging from several years to several thousand years. GHGs persist in the atmosphere for a long enough time to be dispersed around the globe, cumulatively combining to cause a global climate effect.

3.7.4 - Regulatory Framework

The following section describes federal, State, regional, and local regulations and policies that are specific to reducing GHG emissions and are applicable to the proposed project.

Federal Regulations for GHGs

The United States Environmental Protection Agency (EPA) is the governing body responsible for regulating air pollution in the United States and setting nationwide air quality and emissions standards. The EPA adopts and implements several regulations to reduce GHG emissions as well. These include GHG emission reduction standards for passenger cars and light-duty trucks, heavy-duty trucks (including buses), commercial aircraft and large business jets, heavy equipment (with spark-ignition engines and compression-ignition diesel engines), locomotives, marine vessels, recreational vehicles, and small equipment/tools.

California has implemented more stringent GHG emissions reduction regulations on the same sources listed above (excepting commercial aircraft and large business jets). Therefore, those regulations and their impact are discussed in greater detail below.

State Regulations for GHGs

California has taken several legislative steps to reduce Statewide GHG emissions and is internationally known for its leadership on action to address climate change. In 2006, the California Legislature passed AB 32, which created a comprehensive, multi-year program to reduce GHG emissions in California and required the State (by law) to reduce GHG emissions to 1990 levels by 2020. The Legislature built upon this law by passing SB 32, which requires the State to reduce GHG emissions 40 percent below 1990 levels by 2030 and later passed AB 1279 which requires the State to achieve net-zero GHG emissions by 2045, and net-negative emissions thereafter. To achieve these State-mandated emissions reduction targets, a document known as the Scoping Plan was required to be created by the ARB beginning in 2007 and be updated at least once every 5 years to "ensure the GHG emissions reduction activities to be adopted and implemented by the state board are complementary, nonduplicative, and can be implemented in an efficient and cost-effective manner." The Scoping Plan outlines strategies across nearly all levels of California's government and economy and defines–at a granular level—the regulatory actions needed to reduce GHG emissions from all economic sectors to meet the targets.

The ARB is the Statewide governing body which focuses on California's unique air quality challenges by setting the State's own, stricter, GHG and air pollutant emissions standards for a range of Statewide pollution sources including vehicles, fuels, on- and off-road equipment, and consumer products. The ARB also manages the cap-and-trade program to achieve GHG emission reductions from large industrial facilities. ARB has pioneered a range of approaches in California that have set the standard for effective air and climate programs for the nation and the world. ARB regulations, based on extensive research and established science, have driven innovation leading to significant technological developments such as the production of low- and zero-emission cars and trucks and cleaner fuels. As stated, ARB is tasked by the Legislature with updating the Scoping Plan, which was most recently adopted in 2022 (2022 Scoping Plan), to ensure the State carries out actions to meet the 2030 and 2045 GHG emissions reduction targets.

Other State agencies responsible for regulating GHGs include:

- **California Energy Commission (CEC):** The State's energy policy and planning agency, responsible for climate change-related programs including energy efficiency and leading the State to a 100 percent clean energy reality. The CEC mandates building energy efficiency standards (in new and existing buildings) and manages the Renewables Portfolio Standard (RPS).
- **California Department of Resources Recycling and Recovery (CalRecycle):** California's recycling and waste management agency, responsible for implementation of State climate policies including landfill methane emissions reduction, waste-to-energy production, and composting requirements. CalRecycle implements food and yard waste recycling regulations, including mandates to cut organic waste disposal 75 percent by 2025.
- **California Governor's Office of Planning and Research (OPR):** California's long-range planning agency, responsible for implementing California Environmental Quality Act (CEQA) review and conducting Statewide research on all climate change policies and impacts.

As a result of these actions, California reached its 2020 GHG emissions reduction target of reducing GHG emissions back to 1990 levels 4 years early and is on track to meet the 2030 GHG reduction target. Below is a summary of State regulations that are applicable to the proposed project and will serve to reduce GHG emissions now and in the future to ensure California stays on the path to meeting the State-mandated 2030 and 2045 targets:

- **Advanced Clean Cars II (ACC II):** Designed to reach 100 percent new vehicle Zero-Emission Vehicles (ZEVs) and clean plug-in hybrid-electric vehicles (PHEVs) in California by the 2035 model year.
- **Advanced Clean Fleets:** A manufacturer requirement for 100 percent of sales of medium- and heavy-duty vehicles to be ZEVs by 2036, and fleet requirements to purchase and deploy ZEVs in State and local government fleets, drayage truck operations, and high-priority federal fleets.
- **Advanced Clean Trucks Regulation:** Require fleets to transition to ZEV medium- and heavy-duty vehicles.
- **Small Off-Road Engine Regulations:** Transition 100 percent of small off-road spark-ignition engines (at or below 25.5 horsepower and used in non-stationary equipment) to zero-emission by 2035 (where feasible).
- **Low Carbon Fuel Standard:** Increase the availability and use of low carbon fuels, including renewable diesel, biodiesel, renewable, and natural gas by mandating that the fuel carbon intensity in California must achieve a 20 percent reduction by 2030.
- **Renewable Portfolio Standard:** One of California's key programs for advancing renewable energy, it sets continuously escalating renewable energy procurement requirements for the State's load-serving entities. All entities must procure 60 percent of their electricity portfolio from renewable energy resources by 2030.

- **Building Energy Efficiency Standards–Title 24, Part 6 (Energy Code):** Contain energy and water efficiency requirements (and indoor air quality requirements) for newly constructed buildings; the requirements have gradually increased in efficiency and technology over the past decades. The current standard, known as the 2022 Energy Code, builds on California's technology innovations, and includes encouraging heat pumps, requiring electric-ready single-family homes, and solar/battery storage standards for various building types. The 2022 Energy Code also strengthens ventilation standards to improve indoor air quality. The next update to the Energy Code, known as the 2025 Energy Code, will apply to newly constructed buildings effective as of January 1, 2026.
- **California Green Building Standards Code–Title 24, Part 11 (CALGreen):** Mandatory green building standards code for the State with the goal of reducing GHG emissions from buildings, including reducing energy and water consumption.

Regional Regulations for GHGs

The Bay Area Air Quality Management District (BAAQMD) regulates air pollutant emissions from businesses and stationary facilities, ranging from oil refineries to auto body shops and dry cleaners. The BAAQMD is the primary agency responsible for ensuring that the Clean Air Act and California Ambient Air Quality Standards (CAAQS) are attained and maintained in its jurisdiction. The BAAQMD CEQA Thresholds (and associated guidance) are intended to assist lead agencies in evaluating air quality and climate impacts from proposed land use projects in the San Francisco Bay Area Air Basin (SFBAAB) during the environmental review process.

Local Regulations for GHGs

City of Pleasanton, Climate Action Plan 2.0

The City of Pleasanton's Council adopted an updated Climate Action Plan (CAP 2.0) in February 2022, with minor revisions in February 2023. CAP 2.0 updates the City's original CAP, which was adopted in 2012. It outlines local actions to reduce GHG emissions, enhance environmental sustainability and prepare for climate change. The plan builds on the success of the original CAP, which surpassed its target of reducing emissions 15 percent below 2005 levels by 2020. CAP 2.0 aims to further reduce GHG emissions, enhance local environmental sustainability, and improve resilience to climate change. Key objectives include creating evidence-based, actionable policies, and ensuring compliance with CEQA. The plan addresses increased heat, extreme weather, wildfire risk, and water uncertainty, emphasizing the need for a clear path forward to maintain a vibrant, healthy, and sustainable community.[6]

3.7.5 - Methodology

The California Emission Estimator Model (CalEEMod) is used to calculate and assess GHG emissions which consist of those on-site and off-site construction and operational emissions generated from all facets of the proposed project. CalEEMod provides a uniform platform for government agencies, land use planners, and environmental professionals to estimate emissions from land use

[6] City of Pleasanton. 2022. Climate Action Plan. Website: https://www.cityofpleasantonca.gov/our-government/key-initiatives/climate-action-plan/. Accessed March 6, 2025.

development and linear projects in California. It utilizes widely accepted methodologies for estimating emissions combined with default data that can be used when site-specific information is not available. Sources of these methodologies and default data include the EPA's AP-42 emission factors, ARB's vehicle emission models (such as EMFAC), and studies commissioned by California agencies such as the CEC. In addition, some local air districts provided customized information to support defaults and calculations for projects located in their jurisdictions.

Construction and operational emissions reported in this analysis were modeled using CalEEMod Version 2022.1.

Greenhouse Gases Assessed

This analysis is restricted to GHGs identified by AB 32, which include CO, CH_4, N_2O, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Total GHG emissions in this report are quantified and expressed as CO_2e.

Certain GHGs defined by AB 32 would not be emitted by the proposed project. Perfluorocarbons and sulfur hexafluoride are typically used in industrial applications, none of which would be used by the proposed project.

Default Data and Assumptions

The recommendations contained within the BAAQMD 2022 CEQA were used as a reference in preparation of the air quality analysis.

CalEEMod provides default values for estimating construction and operational emissions from Bay Area specific projects. Although users may apply the default values, BAAQMD strongly recommends that default values be modified whenever project-specific information is available to obtain more accurate emissions quantification. When site-specific information is unavailable, BAAQMD recommends that the most conservative estimates be used for the type of construction equipment and number of pieces of equipment to be used, the hours of operation, and the distance to the nearest sensitive receptors.

When changing any default parameters, users must include notes and references in the Justification for Changes box, which will facilitate reviews by lead agencies and other stakeholders. These Justification for Changes were documented when site-specific information was used instead of defaults. The CalEEMod report in Appendix B includes a listing of these changes and the notes include references to additional calculations and documentation which are also included in Appendix A following the CalEEMod Report.

Model Inputs

Quantifying air pollutant emissions associated with land development projects involves identifying all sources of relevant air pollutant emissions that could occur as a result of implementation of the proposed project and calculating criteria air pollutants by activity level and emission factor. Emission factors represent the emission rate of a pollutant over a given time or activity, for example, grams of nitrogen oxide ($NO_{X)}$ per vehicle mile traveled or grams of NO_X per horsepower hour of equipment

operation. The activity factor is a measure of how active a piece of equipment or device is and can be represented as the amount of material processed, elapsed time that a piece of equipment is in operation, horsepower of a piece of equipment used, the fuel consumption rate, or Vehicle Miles Traveled (VMT) per day. The ARB has published emission factors for on-road mobile vehicles/trucks in the Emission Factor (EMFAC) mobile source emissions model and emission factors for off-road equipment and vehicles in the OFF-ROAD emissions model. An air emissions model (or calculator) combines the emission factors and the levels of activity and outputs the emissions for the various pieces of equipment.

GHG Analysis Methodology

Construction

Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and prevailing weather conditions. Construction emissions result from on-site and off-site activities. On-site emissions principally consist of exhaust emissions from the activity of light and heavy-duty construction equipment, and motor vehicle operation. Off-site emissions are caused by motor vehicle exhaust from delivery vehicles and worker traffic. Construction emissions reported in this analysis were modeled using CalEEMod Version 2022.1.

Schedule

Based on applicant-provided information, the construction was estimated to begin in early 2026 and would last for approximately 3 years. The construction emissions modeling reflects that duration and is assumed for the purposes of this environmental analysis. The construction schedule used in the analysis represents a "worst-case" analysis scenario because emission factors for construction equipment decrease as the analysis year increases due to improvements in technology and compliance with more stringent regulatory requirements. Therefore, construction emissions would decrease if the construction schedule moved to later years. The duration of construction activity and associated equipment represent a reasonable approximation of the expected construction fleet as required by the CEQA Guidelines. Construction activities that emit GHG emissions would consist of demolition, site preparation, grading, and building construction. The modeled construction schedule, worker commute trips, vendor and haul truck trips, and construction equipment, along with hours of operation per day, horsepower, and load factor are available in Appendix B.

Construction Equipment Tiers and Emission Factors

A summary of the on-site, off-road construction equipment usage assumptions used to estimate emissions is presented in Appendix B. This analysis uses the CalEEMod default horsepower and load factors for off-road equipment. Off-road equipment is modeled using the "Average" option which uses Statewide average fleetwide emission factors from ARB's ORION model for the project construction year (for the unmitigated scenario).

Demolition

Quantities of demolition materials may be entered directly in tons or calculated using methods internal to CalEEMod based on the square footage of the building. Because the demolition quantities assume a building structure and demolition would involve both a building and substantial quantities of pavement removal, the amount of material quantity for each was determined outside of

CalEEMod (off-model), accounting for the nature of each type of demolition and material density. It was then converted to tons and entered into CalEEMod this way. Details of these additional calculations are included along with the CalEEMod report in Appendix B.

Site Preparation and Grading

Hauling would be required to export material to/from the project site; according to applicant-provided information, the site will be balanced and will result in no additional daily haul trips during the site preparation phase.

Building Construction

During building construction activities, on-site emissions are primarily generated from the off-road construction equipment and are calculated using the equipment specified along with the ARB Off-Road Emission and Load Factors, the number of construction days and hours of operation per day.

Off-Site Construction Vehicles

A summary of the construction-related vehicle trips is shown in Appendix B. Note that the total number of construction vehicle trips would not necessarily occur on the same day because construction activities would vary each day during the construction period.

Off-road emissions for demolition, site preparation, and grading phases are based on construction worker and haul trips both calculated internally in CalEEMod based on the number of pieces of off-road construction equipment for workers and the amount of demolition materials for hauling, assuming a 16 cubic yard capacity truck. Vendor trips may be optionally added for each phase as appropriate to the project and were added to the site preparation phase to account for the off haul of soil export and in the paving phase to account for delivery of asphalt and any aggregate base material needed for paving. Default hauling trips are 20 miles; Vendor trips are 8.4 miles and worker commute trip lengths are 11.7 miles based on the site location.

Trips for building construction and architectural coating activities are based on the square footage of the buildings and the number of dwelling units for residential land uses.

Mitigation Measures

Emissions modeling was performed for an unmitigated scenario for this project.

Operation

To assess operational-related GHG emissions and their potential to cause a significant impact, the proposed project is analyzed for its consistency with the City's CAP 2.0. This is discussed in greater detail in the analysis section below.

3.7.6 - Thresholds of Significance

The BAAQMD's 2022 CEQA Air Quality Guidelines provide recommended significance thresholds for GHGs for land use development projects and plans. The new thresholds state that, if a project would contribute its "fair share" of what will be required to achieve California's long-term climate goal of carbon neutrality by 2045, then a reviewing agency can find that the impact will not be significant because the project will help to solve the problem of global climate change. The thresholds for new

land use projects require projects to meet either one of two enumerated Criteria "A" or "B.". If a land use development project cannot demonstrate consistency with Criterion A or Criterion B, then that project would result in a potentially significant impact related to the generation of direct and indirect GHG emissions.

Project consistency with Criteria A is based on incorporating project design criteria based on key attributes consistent with the 2022 Scoping Plan and the State's long-term carbon neutrality goals. Projects incorporating these elements would be contributing their "fair share" of what will be required to achieve California's long-term climate goal of carbon neutrality by 2045. These include criteria for building energy design (elimination of natural gas) as well as criteria related to reduction in transportation emissions via VMT reductions and installation of electric vehicle (EV) charging infrastructure.

Project consistency with Criterion B involves demonstrating compliance with a local "qualified" GHG plan. CEQA Guidelines Section 15183.5(b) allows projects and plans to be analyzed through a streamlined or tiered approach utilizing an adopted Greenhouse Gas Reduction Plan. A "qualified" reduction strategy capable of being utilized for a streamlined or tiered analysis under CEQA must meet the following requirements:

- Quantify GHG emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;
- Establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable;
- Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area;
- Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;
- Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendments if the plan is not achieving specified levels; and
- Be adopted in a public process following environmental review.

In 2020, the City adopted a Greenhouse Gas Reduction Strategy (GHGRS) that outlines the actions the City will undertake to achieve its proportional share of State GHG emission reductions for the interim target year 2030. The purpose of the GHGRS Compliance Checklist (Checklist) is to:

- Implement GHG reduction strategies from the 2030 GHGRS to new development projects.
- Provide a streamlined review process for proposed new development projects that are subject to discretionary review and trigger environmental review pursuant to CEQA.

The City's Council adopted an updated CAP 2.0 in February 2022, with minor revisions in February 2023. CAP 2.0 updates the City's original CAP, which was adopted in 2012. CAP 2.0 outlines local

actions to reduce GHG emissions, enhance environmental sustainability, and prepare for climate change.[7]

To assess the modified proposed project's generation of GHG emissions and their potential to cause a significant impact, the proposed project is analyzed for its consistency with the City's CAP 2.0. In regard to demonstrating project consistency with applicable GHG plans, the proposed project must be consistent with a local GHG reduction strategy (BAAQMD Threshold B) or meet the minimum project design elements recommended by BAAQMD (BAAQMD Threshold A). Threshold B is being applied to the analysis of this project as the City has adopted a qualified CAP that includes a CAP Consistency Checklist.

Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the GHGRS.

Using the above criteria as a framework for analysis, the City utilizes the guidance in Appendix G to the CEQA Guidelines to establish the following thresholds to determine whether impacts related to GHG emissions would result in significant environmental effects. Accordingly, the proposed project would have an impact on the environment if it would:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.

3.7.7 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the project and provides mitigation measures where necessary.

Greenhouse Gas Emissions

Impact GHG-1:	**The proposed project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.**

Impact Analysis

GHG emissions associated with development of the proposed project would occur over the short term from construction activities, consisting primarily of emissions from equipment exhaust and worker and vendor trips. There would also be long-term operational emissions associated with vehicular traffic within the project vicinity, energy and water usage, and solid waste disposal.

As previously stated, the City adopted an updated CAP 2.0 in February 2022, with minor revisions in February 2023. CAP 2.0 updates the City's original CAP, which was adopted in 2012. CAP 2.0 outlines

[7] City of Pleasanton. 2022. Climate Action Plan. Website: https://www.cityofpleasantonca.gov/our-government/key-initiatives/climate-action-plan/. Accessed March 6, 2025.

local actions to reduce GHG emissions, enhance environmental sustainability, and prepare for climate change.[8]

To assess the proposed project's generation of GHG emissions and their potential to cause a significant impact, the proposed project is analyzed for its consistency with the City's CAP 2.0. In regard to demonstrating project consistency with applicable GHG plans, the proposed project must be consistent with a local GHG reduction strategy (BAAQMD Threshold B) or meet the minimum project design elements recommended by BAAQMD (BAAQMD Threshold A). Threshold B is being applied to the analysis of this project as the City has adopted a qualified CAP that includes a CAP Consistency Checklist.

Construction

GHG emissions associated with construction were computed at 1,262.46 MT CO_2e for the total construction period. These are the emissions from on-site operation of equipment for demolition, site preparation (such as grading), vendor and hauling truck trips, and worker trips. Neither the City nor BAAQMD have an adopted threshold of significance for construction-related GHG emissions, though the OPR recommends quantifying emissions and disclosing that GHG emissions would occur during construction, even in cases where BAAQMD does not. GHG emissions associated with development of the proposed project would occur over the short-term from construction activities, consisting primarily of emissions from equipment exhaust and worker and vendor trips. Therefore, the construction GHG emissions would have a less than significant impact and would not conflict with any GHG plans or policies.

Operation

The proposed project would be associated with long-term operational emissions from vehicular traffic within the project vicinity, energy and water usage, and solid waste disposal.

As stated, to assess operational-related GHG emissions and their potential to cause a significant impact, the proposed project is analyzed for its consistency with the City's CAP 2.0. The CAP 2.0 Checklist sets forth several strategies for GHG reductions across areas including energy, waste, and water. The proposed project will be subject to and will comply with the requirements generally applicable to new construction and covered projects (which includes new residential construction), accounting for economic and technological feasibility considerations as allowed by CAP 2.0. As noted in the CAP 2.0 Checklist, a completed copy of the Checklist is required to accompany discretionary application submittals and is available in Appendix A. Some examples of GHG reduction measures consistent with CAP 2.0 are presented below:

Green Building Standards

- The proposed project will comply with the latest version of mandatory measures in the CALGreen Code.
- The proposed project will comply with the Pleasanton Municipal Code Chapter 17.50.

[8] City of Pleasanton. 2022. Climate Action Plan. Website: https://www.cityofpleasantonca.gov/our-government/key-initiatives/climate-action-plan/. Accessed March 6, 2025.

- The proposed project will comply with being a Leadership in Energy and Environmental Design (LEED®) Neighborhood.

Energy

- The project will comply with the requirement to include a solar photovoltaics (PV) system that meets the power needs of the new building at the time of construction. The applicant has indicated adherence to both the current 2022 Uniform Building Code (UBC) and the anticipated 2025 UBC, which includes provisions for solar energy systems.
- The project will be all-electric, with no new gas infrastructure included. This encompasses all aspects such as lighting, heating, cooking, and water heating. The applicant has indicated adherence to both the current 2022 UBC and the anticipated 2025 UBC, which support this all-electric approach.

Waste

- The proposed project will comply with Municipal Code requirements for cement and asphalt recycling and reuse.
- The Pleasanton Garbage Services serves residential and commercial locations in the City. Service is provided on a weekly basis. Each residential household would be provided with a garbage cart and recycling cart.

Water

- The proposed project will comply with Municipal Code requirements and the City's Water Efficient Landscape Ordinance.
- The landscape plan indicates that the irrigation design for the site shall comply with the State of California model water efficient landscape ordinance (Title 23–Division 2–Chapter .2.7) and the City of Pleasanton water efficient landscape standards.

As noted above, the proposed project is consistent with the CAP 2.0, which meets the requirements of Criterion B of BAAQMD's 2022 CEQA thresholds of significance, and therefore, the proposed project would result in a less than significant impact.

Level of Significance

Less than significant impact.

Mitigation Measures

None.

Conflict with Plan, Policy, or Regulation that Reduces Emissions

Impact GHG-2:	**The proposed project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.**

Impact Analysis

As noted above, the proposed project is consistent with the CAP 2.0. The proposed project would also be constructed in conformance with then-current CALGreen and Title 24 Building Codes, which require high-efficiency water fixtures, water efficient irrigation systems, and compliance with current energy efficiency standards. Compliance with these standards ensures compliance with State and federal plans, policies, and regulations applicable to GHG emissions. In addition, the proposed project will be all-electric in design, which supports the State's longer-term goal of decarbonization. Therefore, the proposed project would result in a less than significant impact.

Level of Significance After Mitigation

Less than significant impact.

Mitigation Measures

None.

3.7.8 - Cumulative Impacts

The geographic scope of the cumulative GHG emissions analysis is the SFBAAB, which covers all or portions of the nine counties that surround San Francisco Bay: Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, southwestern Solano, and southern Sonoma counties. In a larger sense, however, the relevant geographic area is the entire Earth, as explained by the California Supreme Court in C*enter for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204, 219, "because of the global scale of climate change, any one project's contribution is unlikely to be significant by itself."

"With respect to climate change, an individual project's emissions will most likely not have any appreciable impact on the global problem by themselves, but they will contribute to the significant cumulative impact caused by greenhouse gas emissions from other sources around the globe. The question therefore becomes whether the project's incremental addition of GHG emissions is 'cumulatively considerable' in light of the global problem, and thus significant." (Ibid., quoting Crockett, Addressing the Significance of Greenhouse Gas Emissions Under CEQA: California's Search for Regulatory Certainty in an Uncertain World (July 2011) 4 Golden Gate U. Envtl. L.J. 203, 207–208)).

The proposed project would emit new GHG emissions, as would other past, present, and reasonably foreseeable projects within the Air Basin.

The GHG emissions impact analysis above constitutes a cumulative analysis, in that it considers global, Statewide, and regional GHG emissions, as well as the contribution of the proposed project to GHG emission impacts. Therefore, the significance conclusions reached above for the project-level GHG impact under GHG-1 and GHG-2 also constitute~~s~~ the significance conclusions in this Draft Environmental Impact Report (Draft EIR) with respect to cumulative GHG emissions impacts. Therefore, because GHG emissions generated by the proposed project in conjunction with other past, present, and reasonably foreseeable projects in the Basin and around the world would not

exceed established thresholds, the project would not result in potentially significant cumulatively considerable GHGs.

All cumulative projects would be required to comply with City ordinances, General Plan policies, and CAP 2.0 measures, as appropriate, to reduce GHG emissions. Cumulative projects would also be required to comply with existing federal, State, and local regulations and policies to reduce community-wide GHG emissions. Finally, cumulative projects would be required to comply with the requirements of CEQA and obtain all necessary clearances and permits. For these reasons, cumulative impacts related to conflicts with plans, policies and regulations would be less than significant. Moreover, as discussed above, because the proposed project is consistent with all applicable plans, policies and regulations, its incremental contribution to less than significant cumulative impacts would not be cumulatively considerable.

Level of Cumulative Significance

Less than significant impact.

Mitigation Measures

None.

3.8 - Hazards and Hazardous Materials

3.8.1 - Introduction

This section describes the existing hazards and hazardous materials setting and potential effects from project implementation on the project site and its surrounding area. Descriptions and analysis in this section are based, in part, on the Pleasanton General Plan and relevant State of California websites. During the Environmental Impact Report (EIR) scoping period, no comments related to hazards and hazardous materials were received.

3.8.2 - Environmental Setting

Hazards

This description of existing conditions focuses on hazards from fire and overhead power lines, as well as hazardous materials and waste. A hazard is a situation that poses a level of threat to life, health, property, or the environment. Hazards can be dormant or potential, with only a theoretical risk of harm. However, once a hazard becomes active, it can create an emergency. A hazardous situation that has already occurred is called an incident. Emergency response is action taken in response to an unexpected and dangerous occurrence in an attempt to mitigate its impact on people, structures, or the environment. Emergency situations can range from natural disasters to hazardous materials problems and transportation incidents.

Hazardous Substances

A hazardous substance can be any biological, natural, or chemical substance, whether solid, liquid, or gas, that may cause harm to human health. Hazardous substances are classified on the basis of their potential health effects, whether acute (immediate) or chronic (long-term). Dangerous goods are classified on the basis of immediate physical or chemical effects, such as fire, explosion, corrosion, and poisoning. An accident involving dangerous goods could seriously harm human health or damage property or the environment. Harm to human health may happen suddenly (acute), such as dizziness, nausea, and itchy eyes or skin; or it may happen gradually over years (chronic), such as dermatitis or cancer. Some people can be more susceptible than others. Hazardous substances and dangerous goods can include antiseptic used for a cut, paint for walls, a cleaning product for the bathroom, chlorine in a pool, carbon monoxide from a motor vehicle, fumes from welding, vapors from adhesives, or dust from cement, stone, or rubber operations. Such hazardous substances can make humans very sick if they are not used properly.

Per- and Polyfluoroalkyl Substances

Per- and polyfluoroalkyl substances (PFAS) are a group of thousands of chemicals used since the 1940s to make commercial products, including carpets, clothing, food packaging, and cookware because they are waterproof, stain-resistant, and non-stick; they also have been used in fire-retarding foam and various industrial processes.[1] They can be introduced into the body through ingestion of contaminated food or liquid and inhaling or touching products with packaging treated

[1] United States Environmental Protection Agency (EPA). 2023. Our Current Understanding of the Human Health and Environmental Risks of PFAS. Website: https://www.epa.gov/pfas/our-current-understanding-human-health-and-environmental-risks-pfas. Accessed May 8, 2025.

with the substance. They can contaminate drinking water supplies when products containing PFAS are used or spilled on the ground and they migrate into groundwater, and, once in groundwater, PFAS can travel large distances and contaminate drinking water wells. Major sources of PFAS contamination include fire training/fire response sites, military bases, industrial sites, and landfills.

In March 2019, the California State Water Resources Control Board (State Water Board) initiated a Statewide PFAS phased investigation for hundreds of drinking water sources, including Zone 7 Water Agency (Zone 7) and the Livermore District. The Livermore District has 12 groundwater wells within its service area.

In March 2023, the United States Environmental Protection Agency (EPA) issued a proposed National Primary Drinking Water Regulation (NPDWR) for certain PFAS. The proposed regulation calls for a maximum containment level for perfluorooctanesulphonic acid (PFOS) and perfluorooctanoic acid (PFOA) of 4 parts per trillion (ppt) each. Four additional PFAS—perfluorononanoic acid (PFNA), perfluorohexanesulfonic acid (PFHxS), perfluorobutanesulfonic acid (PFBS), and GenX chemicals—would have a combined hazard index (HI) limit of 1.0; the HI calculation would determine if the levels of these PFAS as a mixture pose a potential risk.[2]

According to the California Water Service (Cal Water) 2022 Water Quality Report for the Livermore District System, prior to issuance of this regulation, Cal Water had already proactively tested active sources in their systems for all six PFAS and had taken the affected sources out of service until treatment was installed. Thus, none of their active water sources have levels of the six PFAS compounds over current California response levels. The response level, which is the level at which a water system should make operational changes to reduce the concentration of a compound, is set with a margin of protection for all people (including sensitive populations) over a lifetime of exposure.[3]

On April 10, 2024, the EPA announced the final NPDWR for six PFAS, including individual Maximum Contaminant Levels (MCLs) for PFOA and PFOS at 4 parts per trillion (ppt); individual MCLs for PFHxS, PFNA, and GenX Chemicals at 10 ppt; and an MCL for a mixture of 4 PFAS (PFHxS, PFNA, GenX Chemicals, and PFBS) at no greater than an HI of 1.0.[4]

The EPA also finalized health-based, non-enforceable Maximum Contaminant Level Goals (MCLGs) for these PFAS. Public water systems must monitor for these PFAS and have 3 years to complete initial monitoring (by 2027), followed by ongoing compliance monitoring. Public water systems will have 5 years (by 2029) to implement solutions that reduce these PFAS if monitoring shows that drinking water levels exceed these MCLs. Primary agencies, such as the State, will have up to 2 years to adopt standards that are no less stringent than the federal standards.[5]

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[2] California Water Service (Cal Water). 2022. Water Quality Report for Livermore District, Livermore System. Website: https://www.calwater.com/docs/ccr/2022/liv-liv-2022.pdf. Accessed March 24, 2024.

[3] Ibid.

[4] Zone 7 Water Agency. 2020. PFAS Information. Website: https://www.zone7water.com/pfas#:~:text=On%20April%2010%2C%202024%2C%20the%20U.S.%20Environmental%20Protection,Zone%207%20has%20been%20doing%20voluntarily%20since%202019. Accessed March 24, 2024.

[5] Ibid.

Zone 7 has already begun implementing voluntary changes to meet the MCLGs, including the following actions:

- Reduced the production of the Mocho wellfield by nearly two-thirds,
- Increased Zone 7's use of surface water,
- Started a conceptual design for a Mocho PFAS treatment facility with the goal of having the facility online in 2–3 years, which will be Zone 7's third PFAS treatment facility,
- Installed Ion Exchange PFAS Treatment at the Stoneridge Well facility, which is online now, and
- Began installing Ion Exchange PFAS Treatment at the Chain of Lakes Facility, which will be online by the end of 2025.[6]

Project Site

The project site is currently undeveloped, with the exception of two residential homes and related structures.

Hazards Materials and Wastes

Hazardous materials include but are not limited to hazardous materials, hazardous substances, and hazardous wastes, as defined in Section 25501 and Section 25117, respectively, of the California Health and Safety Code. A hazardous material is any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released; and any material that a handler or an administering regulatory agency under Section 25501 has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment. Various properties may cause a substance to be considered hazardous, including:

- Toxicity—causes human health effects;
- Ignitability—has the ability to burn;
- Corrosivity—causes severe burns or damage to materials; and
- Reactivity—causes explosions or generates toxic gases.

Hazardous waste is any hazardous material that is to be discarded, abandoned, or recycled. The criteria that define a material as hazardous also define a waste as hazardous. Specifically, materials and waste may be considered hazardous if they are poisonous (toxic); can be ignited by open flame (ignitable); corrode other materials (corrosive); or react violently, explode, or generate vapors when mixed with water (reactive). Soil or groundwater contaminated with hazardous materials above specified regulatory State or federal thresholds is considered hazardous waste if it is removed from a site for disposal. If handled, disposed, or otherwise handled improperly, hazardous materials and hazardous waste can result in public health hazards if released into the soil or groundwater or through airborne releases in vapors, fumes, or dust. Soil and groundwater having concentrations of

[6] Zone 7 Water Agency. 2020. PFAS Information. Website: https://www.zone7water.com/pfas#:~:text=On%20April%2010%2C%202024%2C%20the%20U.S.%20Environmental%20Protection,Zone%207%20has%20been%20doing%20voluntarily%20since%202019. Accessed March 24, 2024.

hazardous constituents higher than specific regulatory levels must be handled and disposed of as hazardous waste when excavated or pumped from an aquifer. The California Code of Regulations, Title 22, Sections 66261.20–24, contains technical descriptions of toxic characteristics that could cause soil or groundwater to be classified as hazardous waste.

The Cortese List is a list of known hazardous materials or hazardous waste facilities that meet one or more of the provisions of Government Code Section 65962.5, including:

- The list of hazardous waste and substances sites from the California Department of Toxic Substances Control (DTSC) EnviroStor database.[7]
- The list of leaking underground storage tank (LUST) sites by county and fiscal year from the State Water Board GeoTracker database.[8]
- The list of solid waste disposal sites identified by the State Water Board with waste constituents exceeding hazardous waste levels outside the waste management unit.[9]
- The list of active cease and desist orders and cleanup and abatement orders from the State Water Board.[10]
- The list of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, as identified by the DTSC.[11]

Project Site and Project Vicinity

The proposed project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

The State of California uses databases including GeoTracker and EnviroStor to map the location of hazardous waste sites, including sites that have been remediated, sites currently undergoing remediation, and sites that require cleanup.

The GeoTracker website showed no sites of concern on the proposed project site. The nearest results shown on the GeoTracker website include one completed cleanup site identified as Hexcel Corp (Case #01S0086), located approximately 1,300 feet north of the proposed project site at 11711 Dublin Boulevard, Dublin. The potential contaminants of concern were solvents, and the case was

[7] California Department of Toxic Substances Control (DTSC). 2025. "Cortese" list of DTSC's EnviroStor database list of Hazardous Waste and Substances sites. DTSC's Hazardous Waste and Substances Site List—Site Cleanup (Cortese List). Website: https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,FUDS&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+%28CORTESE%29. Accessed

[8] California State Water Resources Control Board (State Water Board). 2025. "Cortese" List of Leaking Underground Storage Tank Sites by County (San Francisco County). Website: https://geotracker.waterboards.ca.gov/search?CMD=search&case_number=&business_name=&main_street_name=&city=&zip=&county=&SITE_TYPE=LUFT&oilfield=&STATUS=&BRANCH=&MASTER_BASE=&Search=Search. Accessed

[9] California Environmental Protection Agency (Cal/EPA). 2025. "Cortese" list of solid waste disposal sites identified with waste constituents above hazardous waste levels outside the waste management unit. Website: https://calepa.ca.gov/wp-content/uploads/2016/10/SiteCleanup-CorteseList-CurrentList.pdf. Accessed

[10] California Environmental Protection Agency (Cal/EPA). "Cortese" list of State Water Board sites with active Cease and Desist Orders or Cleanup Abatement Orders. Website: 2025. https://calepa.ca.gov/wp-content/uploads/2016/10/SiteCleanup-CorteseList-CDOCAOList.xlsx. Accessed

[11] California Environmental Protection Agency (Cal/EPA). 2025. "Cortese" list of sites subject to Corrective Action pursuant to Health and Safety Code 25187.5. Website: https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/. Accessed

closed on January 1, 2008.[12] An open but inactive cleanup program site identified as Warmington Homes–Hansen Hills (Case #SL18307727), located at Dublin Boulevard and Silvergate Drive, is approximately 2,300 feet northeast of the proposed project site; the potential contaminant of concern is petroleum, and it has been inactive since June, 4, 2009.[13] An inactive tiered permit site identified as Hexcel Corp Technology Center is located approximately 3,000 feet northeast of the site of the proposed project.[14] A completed (LUST cleanup site (Case #RO0003005) is located at 11759 Dublin Boulevard, Dublin, approximately 3,420 feet from the proposed project. The LUST case involved three underground storage tanks (USTs) that were discovered during the conversion of the former Dublin Square Shopping Center. These USTs were subsequently removed and approximately 280 tons of soil was removed during the UST removals. Petroleum hydrocarbons were detected in stockpiled soil samples. The case was closed on August 6, 2015.[15]

A search of the EnviroStor database showed no areas of concern on the site of the proposed project. The nearest site (excluding those mentioned previously) is a voluntary cleanup site identified as Crow Canyon Cleaners, located at 7272 San Ramon Road, approximately one mile to the northeast. The potential contaminant of concern at this site is tetrachloroethylene originating from an operating dry cleaner.[16]

Hazardous Building Materials

Many older buildings contain building materials that consist of hazardous materials. These materials include lead-based paint, asbestos-containing material, and polychlorinated biphenyls (PCBs).

Prior to the EP) ban in 1978, lead-based paint was commonly used on interior and exterior surfaces of buildings. Disturbances such as sanding and scraping activities, renovation work, gradual wear and tear, old peeling paint, and paint dust particulates have been found to contaminate surface soils or cause lead dust to migrate and affect indoor air quality. Exposure to residual lead can cause severe health effects, especially in children.

Asbestos is a naturally occurring fibrous material that was extensively used as a fireproofing and insulating agent in building construction materials before such uses were banned by the EPA in the 1970s. In addition, many types of electrical equipment contained PCBs as an insulator, including transformers and capacitors. After PCBs were determined to be a carcinogen in the mid- to late-1970s, the EPA banned PCB use in new equipment and began a program to phase out certain existing PCB-containing equipment. For example, fluorescent lighting ballasts manufactured after January 1, 1978, do not contain PCBs and are required to have a label clearly stating that PCBs are not present in the unit.'

[12] California State Water Resources Control Board (State Water Board). 2025. GeoTracker. https://geotracker.waterboards.ca.gov/profile_report?global_id=T0600191495. Accessed January 17, 2025.
[13] California State Water Resources Control Board (State Water Board). 2025. GeoTracker. https://geotracker.waterboards.ca.gov/profile_report?global_id=SL18307727. Accessed January 17, 2025.
[14] California Department of Toxic Substances Control (DTSC). 2025. EnviroStor. https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=71002100. Accessed January 17, 2025.
[15] California State Water Resources Control Board. 2025. GeoTracker. https://geotracker.waterboards.ca.gov/profile_report?global_id=T10000001168. Accessed January 17, 2025.
[16] California Department of Toxic Substances Control (DTSC). 2025. EnviroStor. https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=60000883. Accessed January 17, 2025.

Project Site

The project site is currently undeveloped, with the exception of two residential homes and related structures. Asbestos is a concern during demolition of structures that were built prior to 1980. County Assessor's Records indicate that the house at 11021 Dublin Canyon Road was constructed in 1918, and the house at 11033 Dublin Canyon Road was constructed in 1966. Products such as vinyl asbestos tiles, asbestos cement, or other building materials containing asbestos can be expected to occur in buildings constructed prior to the 1970s, when the EPA began to impose bans on certain uses of asbestos.[17]

Fire-related Conditions

Fire hazards present a considerable problem to vegetation and wildlife habitats. Grassland fires are easily ignited, particularly in dry seasons. Wildfire is a serious hazard in undeveloped areas, particularly near areas of natural vegetation and steep slopes, since fires tend to burn more rapidly on steeper terrain. Wildfire is also a serious hazard in areas of high wind, given that fires will travel faster and farther geographically when winds are higher. Burned slopes are highly subject to erosion and gullying.

The project site is currently undeveloped, with the exception of two residential homes and related structures. The most prevalent habitat on the project site is California annual grassland that has been used as rangeland for cattle grazing. Some seasonal wetlands occur in the northern portion of the site near Dublin Canyon Road. Extensive riparian woodland habitat associated with Devany Creek, and its unnamed tributary occur in the southern half of the project site. The area is characterized by oak woodland habitat dominated by coast live oak trees.

According to the California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Zone viewer, the project site is within a High Fire Hazard State Responsibility Area (SRA).[18] Additionally, the Pleasanton General Plan designates the site of the proposed project as a "Special Fire Protection Area." Because Special Fire Protection Areas are defined as areas that require more than 5 minutes of travel time from one of the fire stations, developments in these areas are required to provide additional fire mitigation measures, such as automatic fire sprinkler systems, fire-resistant construction, and early warning fire detection systems.[19]

A Pacific Gas and Electric Company (PG&E) Natural Gas Transmission Pipeline that runs parallel to Foothill Road through the City of Pleasanton is approximately 4,000 feet from the northeastern boundary of the site of the proposed project.[20]

[17] United States Environmental Protection Agency (EPA). 2025. EPA Actions to Protect the Public from Exposure to Asbestos. Website: https://www.epa.gov/asbestos/epa-actions-protect-public-exposure-asbestos. Accessed January 17, 2025.

[18] California Department of Forestry and Fire Protection (CAL FIRE). 2025. Fire Hazard Severity Zones in State Responsibility Areas. Website: https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008. Accessed January, 17, 2025

[19] City of Pleasanton. Pleasanton General Plan 2005–2025. Website: https://www.cityofpleasantonca.gov/assets/our-government/community-development/5.%20Public%20Safety.pdf. Accessed January 17, 2025.

[20] Pacific Gas and Electric Company (PG&E). 2025. Gas Transmission Pipeline Map. Website: https://www.pge.com/en/about/pge-systems/gas-systems.html#tabs-fc6b80548f-item-727cbee02b-tab. Accessed January 17, 2025.

The nearest airport to the project site is Livermore Municipal Airport, approximately 7.10 miles to the east. The project site does not fall within the Sphere of Influence of the Livermore Municipal Airport or any other airport.[21]

3.8.3 - Regulatory Framework

Federal

Occupational Health and Safety Act

The Occupational Safety and Health Administration (OSHA) of the United States Department of Labor is responsible for implementing and enforcing federal laws and regulations that address worker health and safety. OSHA requires specific training for hazardous materials users and handlers, provision of information (procedures for personal safety, hazardous materials storage and handling, and emergency response) to employees who may be exposed to hazardous materials, and acquisition of material safety data sheets from materials manufacturers. Material safety data sheets describe the risks, as well as proper handling and procedures, related to particular hazardous materials. Employee training must include response and remediation procedures for hazardous materials releases and exposures. Construction workers and operational employees at the project site would be subject to these requirements.

Code of Federal Regulations, Titles 29 and 40

Regulations in Code of Federal Regulations Title 29 include requirements to manage and control exposure to lead-based paint and asbestos-containing materials. In California, these requirements are implemented by the California Occupational Safety and Health Administration (Cal/OSHA) under California Code of Regulations Title 8 (see further discussion of California Code of Regulations Title 8, below). The removal and handling of asbestos-containing materials is governed primarily by EPA regulations under Code of Federal Regulations Title 40. The regulations require that the appropriate State agency be notified before any demolition, or before any renovations, of buildings that could contain asbestos or asbestos-containing materials above a specified threshold.

Resource Conservation and Recovery Act and Comprehensive Environmental Response, Compensation, and Liability Act

The EPA is responsible for implementing and enforcing federal laws and regulations pertaining to hazardous materials. The primary legislation includes the Resource Conservation and Recovery Act of 1976 (RCRA) and the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA) and the Emergency Planning and Community Right-to-Know Act (known as SARA Title III). RCRA and the 1984 RCRA Amendments regulate the treatment, storage, and disposal of hazardous and nonhazardous wastes and mandate that hazardous wastes be tracked from the point of generation to their ultimate fate in the environment, including detailed tracking of hazardous materials during transport and permitting of hazardous material handling facilities. As permitted by RCRA, in 1992, the EPA approved California's program called the Hazardous Waste Control Law (HWCL), administered by

[21] Alameda County Airport Land Use Commission (ALUC) and Airport Land Use Planning Airport Land Use Policy Plan. Website: http://www.acgov.org/cda/planning/generalplans/documents/LVK_Ch3_Livermore_Municipal_Airport_Policies.pdf. Accessed January 17, 2025.

DTSC, to regulate hazardous wastes in California, as discussed further below. The purpose of CERCLA is to identify and clean up chemically contaminated sites that pose a significant environmental health threat, and the Hazard Ranking System is used to determine whether a site should be placed on the National Priorities List for cleanup activities. SARA relates primarily to emergency management of accidental releases and requires annual reporting of continuous emissions and accidental releases of specified compounds that are compiled into a nationwide Toxics Release Inventory. Finally, SARA Title III requires formation of State and local emergency planning committees that are responsible for collecting material handling and transportation data for use as a basis for planning and provision of chemical inventory data to the community at large under the "right-to-know" provision of the law.

Hazardous Materials Transportation Act

Under the Hazardous Materials Transportation Act of 1975, the United States Department of Transportation (USDOT), Office of Hazardous Materials Safety regulates the transportation of hazardous materials on water, rail, or highways, through air, or in pipelines and enforces guidelines created to protect human health and the environment and reduce potential impacts by creating hazardous material packaging and transportation requirements. It also includes provisions for material classification, packaging, marking, labeling, placarding, and shipping documentation. The USDOT provides hazardous materials safety training programs and supervises activities involving hazardous materials. In addition, the USDOT develops and recommends regulations governing the multimodal transportation of hazardous materials.

Aboveground Petroleum Storage Act, and Spill Prevention, Control, and Countermeasure Rule

The Aboveground Petroleum Storage Act of 1990, and the Spill Prevention, Control, and Countermeasure (SPCC) Rule (amended 2010) of the Oil Pollution Prevention regulation (40 CFR 112) require the owner or operator of a tank facility with an aggregate storage capacity greater than 1,320 gallons to notify the local Certified Unified Program Agency (CUPA) and prepare an SPCC plan. The SPCC plan must identify appropriate spill containment measures and equipment for diverting spills from sensitive areas and must discuss facility-specific requirements for the storage system, inspections, recordkeeping, security, and training.

Clean Water Act

The Clean Water Act (CWA) (Title 33 § 1251, *et seq.* of the United States Code [33 USC 1251, *et seq.*]) is the major federal legislation governing water quality. The CWA established the basic structure for regulating discharges of pollutants into waters of the United States (not including groundwater). The objective of the act is "to restore and maintain the chemical, physical, and biological integrity of the nation's waters." The CWA establishes the basic structure for regulating the discharge of pollutants into waters of the United States. Responsibility for administering the CWA resides with the State Water Board and nine Regional Water Quality Control Boards (RWQCBs); the San Francisco Bay RWQCB administers the CWA for Alameda County. Section 404 of the CWA regulates temporary and permanent fill and disturbance of waters of the United States, including wetlands. The United States Army Corps of Engineers (USACE) requires that a permit be obtained if a project proposes to place fill in navigable waters and/or to alter waters of the United States below the ordinary high-water mark in non-tidal waters. Section 401 of the CWA requires compliance with State water quality standards

for actions within State waters. Compliance with the water quality standards required under Section 401 is a condition for issuance of a Section 404 permit. Under Section 401 of the CWA, every applicant for a permit or license for any activity that may result in a discharge to a water body must obtain a State water quality certification from the RWQCB to demonstrate that the proposed activity would comply with State water quality standards.

State

California Hazardous Waste Control Law

The HWCL is the primary hazardous waste statute in the State of California and implements RCRA as a "cradle-to-grave" waste management system for handling hazardous wastes in a manner that protects human health and the environment and reduces potential resulting impacts. The law specifies that generators have the primary duty to determine whether their waste is hazardous and to ensure proper management. The HWCL also establishes criteria for the reuse and recycling of hazardous waste used or reused as raw materials. The law exceeds federal requirements by mandating source reduction planning and a much broader requirement for permitting facilities that treat hazardous waste. It also regulates a number of types of waste and waste management activities that are not covered by federal law.

California Health and Safety Code

The California Health and Safety Code (HSC § 25141) defines hazardous waste as a waste or combination of waste that may:

> . . . because of its quantity, concentration, or physical, chemical, or infection characteristics:
>
> (1) Cause or significantly contribute to an increase in mortality or an increase in serious irreversible or incapacitation-reversible illness.
>
> (2) Pose a substantial present or potential hazard to human health or the environment, due to factors including, but not limited to, carcinogenicity, acute toxicity, chronic toxicity, bio accumulative properties, or persistence in the environment, when improperly treated, stored, transported, or disposed of or otherwise managed.

These regulations establish criteria for identifying, packaging, and labeling hazardous wastes; prescribe management practices for hazardous wastes; establish permit requirements for hazardous waste treatment, storage, disposal, and transportation; and identify hazardous waste that commonly would be disposed of in landfills.

Under both the RCRA and the HWCL, hazardous waste manifests must be retained by the generator for a minimum of 3 years. The generator must match copies of the manifests with copies of manifest receipts from the treatment, disposal, or recycling facility.

In accordance with Chapter 6.11 of the California Health and Safety Code (HSC § 25404, *et seq*.), local regulatory agencies enforce many federal and State regulatory programs through the CUPA program, including:

- Hazardous materials business plans (HMBPs) (HSC § 25501, *et seq*.).
- State Uniform Fire Code (UFC) requirements (UFC § 80.103, as adopted by the State Fire Marshal pursuant to HSC § 13143.9).
- UST regulations (HSC § 25280, *et seq*.).
- Aboveground storage tank regulations (HSC § 25270.5(c)).
- Hazardous waste-generator requirements (HSC § 25100, *et seq*.).

California Code of Regulations, Title 8

Cal/OSHA assumes primary responsibility for developing and enforcing workplace safety regulations. These regulations concern the use of hazardous materials in the workplace, including requirements for employee safety training; availability of safety equipment; accident and illness prevention programs; hazardous substance exposure warnings; and preparation of emergency action and fire prevention plans.

Cal/OSHA also enforces hazard communication program regulations, including procedures for identifying and labeling hazardous substances, and requires that safety data sheets (formerly known as material safety data sheets) be available for employee information and training programs. Cal/OSHA standards are generally more stringent than federal regulations. Construction workers and operational employees at the project site would be subject to these requirements.

California Code of Regulations, Title 8, Section 1529 authorizes Cal/OSHA to implement the survey requirements of Code of Federal Regulations Title 29 relating to asbestos. These federal and State regulations require facilities to take all necessary precautions to protect employees and the public from exposure to asbestos. Workers who conduct asbestos abatement must be trained in accordance with federal and State OSHA requirements. The Bay Area Air Quality Management District (BAAQMD) oversees the removal of regulated asbestos-containing materials (see "Asbestos Demolition, Renovation, and Manufacturing Rule" below).

California Code of Regulations, Title 8, Section 1532.1 includes requirements to manage and control exposure to lead-based paint. These regulations cover the demolition, removal, cleanup, transportation, storage, and disposal of lead-containing material. The regulations outline the permissible exposure limit, protective measures, monitoring, and compliance to ensure the safety of construction workers exposed to lead-based material. Loose and peeling lead-based paint must be disposed of as a State and/or federal hazardous waste if the concentration of lead equals or exceeds applicable hazardous waste thresholds. Federal and State OSHA regulations require a supervisor certified to identify existing and predictable lead hazards to oversee air monitoring and other protective measures during demolition activities in areas where lead-based paint may be present. Special protective measures and notification of Cal/OSHA are required for highly hazardous

construction tasks related to lead, such as manual demolition, abrasive blasting, welding, cutting, or torch burning of structures, where lead-based paint is present.

California Code of Regulations Title 22, Division 4.5

California Code of Regulations, Title 22, Division 4.5, contains the Environmental Health Standards for the Management of Hazardous Waste, which includes California waste identification and classification regulations. California Code of Regulations, Title 22, Chapter 11, Article 3, "Soluble Threshold Limits Concentrations/Total Threshold Limits Concentration Regulatory Limits," identifies the concentrations at which soil is determined to be a California hazardous waste. California's Universal Waste Rule (22 California Code of Regulations [CCR] § 66273) provides an alternative set of management standards in lieu of regulation as hazardous wastes for certain common hazardous wastes, as defined in California Code of Regulations, Title 22, Section 66261.9. Universal wastes include fluorescent lamps, mercury thermostats, and other mercury-containing equipment. Existing structures may contain fluorescent light ballasts that could contain mercury or lead. The Alternative Management Standards for Treated Wood Waste (22 CCR § 67386) were developed by the DTSC to allow for disposal of treated wood as a nonhazardous waste, to simplify and facilitate the safe and economical disposal of such waste. Chemically treated wood can contain elevated levels of hazardous chemicals (e.g., arsenic, chromium, copper, pentachlorophenol, or creosote) that equal or exceed applicable hazardous waste thresholds. The Alternative Management Standards provide for less stringent storage requirements and extended accumulation periods, allow shipments without a hazardous waste manifest and a hazardous waste hauler, and allow disposal at specific nonhazardous waste landfills.

Porter-Cologne Act

The Porter-Cologne Water Quality Control Act of 1969 (Porter-Cologne Act) is California's statutory authority for the protection of water quality. Under the Porter-Cologne Act, the State must adopt water quality policies, plans, and objectives that protect the State's waters for the use and enjoyment of the people. Regional authority for planning, permitting, and enforcement is delegated to the nine RWQCBs. The RWQCBs are required to formulate and adopt water quality control plans (also known as basin plans) for all areas of the region and establish water quality objectives in the plans. The Porter-Cologne Act sets forth the obligations of State Water Board and RWQCBs to adopt and periodically update water quality control plans that recognize and reflect the differences in existing water quality, the beneficial uses of the region's groundwater and surface water, and local water quality conditions and problems. It also authorizes the State Water Board and RWQCBs to issue and enforce waste discharge requirements and to implement programs for controlling pollution in State waters. Finally, the Porter-Cologne Act also authorizes the State Water Board and RWQCBs to oversee site investigation and cleanup for unauthorized releases of pollutants to soil and groundwater and in some cases to surface waters or sediments.

California Emergency Response Plan

California has developed an emergency response plan to coordinate emergency services provided by federal, State, and local governments and private agencies. Responding to hazardous materials incidents is one part of this plan. The plan is administered by the California Governor's Office of Emergency Services, which coordinates the responses of other agencies. Emergency response team

members respond and work with local fire and police agencies, emergency medical providers, the California Highway Patrol (CHP), CAL FIRE, California Department of Fish and Wildlife (CDFW), and California Department of Transportation (Caltrans).

California Department of Forestry and Fire Protection

CAL FIRE has mapped fire threat potential throughout California based on the availability of fuel and the likelihood of an area burning (based on topography, fire history, and climate). The threat levels include: no fire threat, Moderate, High, and Very High fire threat. Additionally, CAL FIRE produced a 2019 Strategic Fire Plan for California, which contains goals, objectives, and policies to prepare for and mitigate the effects of fire on California's natural and built environments. CAL FIRE's Office of the State Fire Marshal provides oversight of enforcement of the California Fire Code as well as overseeing hazardous liquid pipeline safety.

California Building Code

The State of California provided a minimum standard for building design through the 2022 California Building Standards Code (CBC), which is located in Part 2 of Title 24 of the California Code of Regulations. The 2022 CBC is based on the 2021 International Building Code but has been modified for California conditions. It is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions. Commercial and residential buildings are plan-checked by local City and County building officials for compliance with the CBC. Typical fire safety requirements of the CBC include the installation of sprinklers in all new high-rise buildings and residential buildings and the establishment of fire resistance standards for fire doors, building material, and particular types of construction.

California Public Resources Code

The California Public Resources Code includes fire safety regulations that restrict the use of equipment that may produce a spark, flame, or fire; requires the use of spark arrestors[22] on construction equipment that use an internal combustion engine; specifies requirements for the safe use of gasoline-powered tools in fire hazard areas; and specifies fire suppression equipment that must be provided on-site for various types of work in fire-prone areas.

These regulations include the following:

- Earthmoving and portable equipment with internal combustion engines would be equipped with a spark arrester to reduce the potential for igniting a wildland fire (California Public Resources Code [PRC] § 4442);
- Appropriate fire suppression equipment would be maintained during the highest fire danger period—from April 1 to December 1 (PRC § 4428);
- On days when a burning permit is required, flammable materials would be removed to a distance of 10 feet from any equipment that could produce a spark, fire, or flame, and the

[22] A spark arrester is a device that prohibits exhaust gases from an internal combustion engine from passing through the impeller blades where they could cause a spark. A carbon trap is commonly used to retain carbon particles from the exhaust.

construction contractor would maintain the appropriate fire suppression equipment (PRC § 4427); and

- On days when a burning permit is required, portable tools powered by gasoline-fueled internal combustion engines would not be used within 25 feet of any flammable materials (PRC § 4431).

Regional

BAAQMD Asbestos Demolition, Renovation and Manufacturing Rule

The removal of asbestos-containing building materials is subject to the limitations of BAAQMD Regulation 11, Rule 2, "Hazardous Materials; Asbestos Demolition, Renovation and Manufacturing." This rule prohibits visible emissions to outside air from any operation involving the demolition of any structure containing asbestos and sets out requirements for demolition of such structures, including a pre-demolition survey conducted by a certified professional. All friable (i.e., crushable by hand) asbestos-containing materials or non-friable asbestos-containing materials that may be damaged must be abated before demolition in accordance with applicable requirements. Friable asbestos-containing materials must be disposed of as asbestos waste at an approved facility. Non-friable asbestos-containing materials may be disposed of as nonhazardous waste at landfills that accept such wastes.

Association of Bay Area Governments Hazard Mitigation Plan

The Association of Bay Area Governments' multijurisdictional Local Hazard Mitigation Plan for the San Francisco Bay Area was updated in 2010 in partnership with the Bay Conservation and Development Commission (BCDC). The Adapting to Rising Tides Program aims to support local governments in the regional plan to address existing and future hazards of climate change. This detailed 5-year plan identifies potential natural and human-made hazards, assesses their potential risks, and includes mitigation methods to reduce risks. The potential hazards identified in the Plan include earthquakes and liquefaction, wildfires, floods, drought, solar storms, dam or levee failure, disease outbreak, freezes, wind, heat, thunder and lightning storms, siltation, tornadoes, hazardous materials, slope failure and mudflows, and other hazards. Similarly, mitigation measures include hazard event planning, emergency preparedness coordination, education, facility upgrades, and monitoring actions.

Local

The Alameda County Hazardous Waste Management Plan governs hazardous waste management programs in Pleasanton. The Alameda County Disaster Plan is a coordinated, countywide approach for managing debris generated in Alameda County in the event of earthquakes, fires, floods, accidents, or civil unrest. As discussed above, the Alameda County Airport Land Use Commission (ALUC) has established airport safety zones and other safety areas.

East County Area Plan

The East County Area Plan (ECAP) is part of the Alameda County General Plan and establishes goals, policies, and programs within the East County area. The ECAP establishes the following goals and policies related to hazards:

Air Quality

Goal To ensure that air pollution levels do not threaten public health and safety, economic development, or future growth.

Policy 299 The County shall require projects that generate high levels of air pollutants, such as manufacturing facilities, hazardous waste handling operations, drive-through restaurants, and banks to incorporate air quality mitigations in their design.

Policy 302 The County shall include buffer zones within new residential and sensitive receptor site plans to separate those uses away from freeways, arterials, point sources, and hazardous material locations.

Environmental Health and Safety

Goal To minimize the risks to lives and property due to fire hazards.

Policy 318 The County shall limit residential development to very low densities in high fire hazard zones as identified by the Fire Hazard Severity Scale.

Policy 321 The County shall require all new homes in rural residential areas that are located in "high" or "very high" fire hazard areas to be sited and designed to minimize risks to life and property.

Policy 324 The County shall require the use of fire-resistant building materials, fire-resistant landscaping, and adequate clearance around structures in "high" and "very high" fire hazard areas.

Alameda County Emergency Operations Plan

The Alameda County Emergency Operations Plan (EOP) provides an overview of the jurisdiction's approach to emergency operations. It identifies emergency response policies, describes the response and recovery organization, and assigns specific roles and responsibilities to County departments, agencies, and community partners. The EOP has the flexibility to be used for all emergencies and will facilitate response and recovery activities in an efficient and effective way.

City of Pleasanton General Plan

The City of Pleasanton General Plan establishes goals, policies, and programs within the City. The General Plan's Public Safety Element establishes the following goals and policies related to fire hazards:

Fire Hazards and Emergency Response

Goal 3 Minimize the risks to lives, property, and the environment due to fire hazards within the Planning Area, and provide the highest quality of emergency response service feasible.

Policy 13 Require fire mitigation measures in new and existing developments that reduce the fire threat to the structure and occupants. Require development outside the 5-minute travel time and in Special Fire Protection Areas to provide effective fire prevention measures.

City of Pleasanton Comprehensive Emergency Management Plan

The Comprehensive Emergency Management Plan addresses the City of Pleasanton's responsibilities in emergencies associated with natural disaster, human-caused emergencies, and technological incidents. It conforms to the State-mandated Standardized Emergency Management System and the National Incident Management System and provides a framework for coordination of response and recovery efforts within the City in coordination and with local, State, and federal agencies. The Plan establishes an emergency organization to direct and control operations during a period of emergency by assigning responsibilities to specific personnel.

City of Pleasanton Emergency Operations Plan

The City of Pleasonton EOP was adopted in 2018. It is an extension of the State of California Emergency Plan, and its concepts are used to coordinate localized emergencies as well as catastrophic disasters. The EOP is designed to be flexible enough to use in all emergencies and facilitates response and short-term recovery activities. The EOP promotes coordination so that the City's capabilities can adapt to a changing response environment and to the needs of supporting organizations. City employees are trained on the plan and participate in exercises periodically to test and validate the plan and to identify both capability gaps and areas for improvement. The plan will be revised as necessary to meet changing conditions.

City of Pleasanton Municipal Code

The Pleasanton Municipal Code contains numerous regulations with respect to hazards and hazardous materials, summarized below:

Chapter 9.16 deals with the implementation of SB 1082 CUPA programs. Such programs include hazardous materials release response plans and inventories; the California accidental release prevention program; underground and aboveground storage tanks storage tanks oversight; and hazardous waste generators and on-site treatment oversight. Pursuant to this Ordinance, the Livermore-Pleasanton Fire Department assumes authority, responsibility, and enforcement authority as the CUPA for the City of Pleasanton.

The Pleasanton Municipal Code contains three sections that bear directly on fire safety. The Building Code, Chapter 20.08, provides minimum standards for design, construction, materials, occupancy, location, and maintenance of all buildings within the City. The Fire Code, Chapter 20.24, regulates how a building is used, how machines and equipment are maintained, how hazardous materials are handled and stored, and how access to and from a site is provided. The Subdivision Ordinance, Chapter 19.36, establishes standards for roadway dimensions, subdivision layout, and public improvements needed to protect public safety. In addition, all new developments are reviewed by City departments for their potential effects on public safety; conditions are attached to minimize those effects; and inspections are conducted to ensure proper installation. Developments located outside the 5-minute response time areas are required to provide additional fire mitigation measures, which include, at a minimum, automatic fire sprinkler systems.

Chapter 9.21 covers construction and demolition debris. Any project that is regulated by the City of Pleasanton must submit a waste management plan (WMP) prior to construction, demolition, or any

similar construction permit. The WMP requires the applicant to disclose estimated quantities of materials that will be salvaged, recycled, or disposed of; the hauling method; and facility being utilized for construction or demolition materials.

3.8.4 - Methodology

The following analysis is based, in part, on information provided by the Pleasanton General Plan and relevant State of California websites. The information obtained from these sources and other relevant materials was reviewed and evaluated to establish the potential presence of hazards and hazardous materials on the project site.

3.8.5 - Thresholds of Significance

The Lead Agency utilizes the criteria in the California Environmental Quality Act (CEQA) Guidelines Appendix G Environmental Checklist to establish thresholds of significance to determine whether impacts to hazards and hazardous materials are significant environmental effects. As such, the City has determined that the proposed project would have a potential impact if it would:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working the project area.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury, or death involving wildland fires.

3.8.6 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the development of the proposed project and provides mitigation measures where appropriate.

Routine Transport, Use, or Disposal of Hazardous Materials

Impact HAZ-1: **The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.**

Impact Analysis

Construction

During the construction of the residential development and related infrastructure, small quantities of hazardous materials typical for construction, such as gasoline, diesel fuel, lubricants for machines, and other petroleum-based products would be used on-site. Removal and disposal of hazardous materials from the project site would be conducted by an appropriately licensed contractor. Any handling, transporting, use, or disposal would comply with applicable laws, policies, and programs set forth by various federal, State, and local agencies and regulations, including the EPA, RCRA, and City of Pleasanton Chapter 9.21, regarding construction and demolition debris.

Asbestos is a concern during demolition of structures that were built prior to 1980. County Assessor's Records indicate that the house at 11021 Dublin Canyon Road was constructed in 1918, and the house at 11033 Dublin Canyon Road was constructed in 1966. Products such as vinyl asbestos tiles, asbestos cement, or other building materials containing asbestos can be expected to occur in buildings constructed prior to the 1970s, when the EPA began to impose bans on certain uses of asbestos.[23]

Mitigation Measure (MM) HAZ-1 requires the applicant to conduct asbestos and lead paint surveys prior to demolition activities and safely remove and dispose of any such materials in accordance with State standards. Implementation of MM HAZ-1 would ensure impacts are reduced to a less than significant level.

Required compliance with applicable hazardous material laws and regulations and implementation of MM HAZ-1 would ensure that construction-related hazardous material use would be less than significant with mitigation.

Operation

During the operational phase of the proposed project, hazardous materials may be utilized on the project site. Because of the nature of the proposed project, hazardous materials used on-site may vary, but would likely be limited to fertilizers, herbicides, pesticides, solvents, cleaning agents, and similar materials used for daily residential operations and home and yard maintenance activities. These types of materials are common for residential developments such as the proposed project and are subsequently regulated by the EPA to minimize harm to people and the environment. Therefore, long-term operational impacts associated with hazardous materials would be less than significant.

[23] United States Environmental Protection Agency (EPA). 2025. EPA Actions to Protect the Public from Exposure to Asbestos. Website: https://www.epa.gov/asbestos/epa-actions-protect-public-exposure-asbestos. Accessed January 17, 2025.

Level of Significance Before Mitigation

Potentially significant impact.

Mitigation Measures

MM HAZ-1 The applicant shall retain a licensed professional to conduct asbestos and lead paint surveys. Prior to the issuance of demolition permits for the two existing residences and associated structures, the applicant shall demonstrate removal of any suspect asbestos-containing materials and lead-based paint to the satisfaction of the City.

Level of Significance After Mitigation

Less than significant impact with mitigation incorporated.

Risk of Upset

Impact HAZ-2:	**The proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment.**

Impact Analysis

Construction-related activity associated with the proposed project would be required to adhere to all applicable regulations. Removal and disposal of hazardous materials from the project site would be conducted by an appropriately licensed contractor. Any handling, transporting, use, or disposal would comply with applicable laws, policies, and programs set forth by various federal, State, and local agencies and regulations, including the EPA, RCRA, and City of Pleasanton Chapter 9.21 regarding construction and demolition debris.

Hazardous materials used on-site during operations may vary, but would likely be limited to fertilizers, herbicides, pesticides, solvents, cleaning agents, and similar materials used for daily residential operations and maintenance activities. These types of materials are common for residential developments such as the proposed project and represent a low risk to people and the environment when used as intended. Therefore, development of the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment. As such, impacts would be less than significant.

Construction

Construction activity would be expected to involve the transport, use, and disposal of hazardous materials, such as diesel fuels, aerosols, and paints. However, the duration of these actions would only be temporary and limited to the period of construction. In addition, the use of these materials would be subject to the Hazardous Materials Transportation Act, California Public Resources Code, and other State and local regulations that would limit the use of hazardous materials and reduce the associated risks of exposure. Therefore, construction impacts related to hazardous materials upset risk would be less than significant.

Operation

The project proposes the construction of 28 residential units and redevelopment of two residential units and associated open space. As such, the proposed project would not be expected to include industrial or retail development that involves hazardous materials such as gas stations, paint stores, or auto parts stores. Unlike industrial or retail facilities, residential development does not involve the type or quantity of hazardous materials that could pose a significant environmental accident.

Small quantities of hazardous materials would be used on-site during operation of the proposed project, but not in sufficient quantities to create significant hazard in the unlikely event of upset or accident. These types of materials are common in such residential projects and represent a low risk to people and the environment when used as intended and would not be expected to result in the release of hazardous materials into the environment. As such, operational impacts related to hazardous materials upset risk would be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

Hazardous Emissions Proximate to a School

Impact HAZ-3:	**The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.**

Impact Analysis

Construction

The project site is not located within 0.25 mile of an existing or proposed school. The closest school, Valley View Christian High School, is located approximately 0.33 mile to the north, across Interstate 580 (I-580). Construction traffic would not be expected near the school since it is separated from the project site by I-580. Construction activity would be expected to involve the transport, use, and disposal of hazardous materials, such as diesel fuels, aerosols, and paints. However, the duration of these actions would only be temporary and limited to the period of construction. In addition, the use of these materials would be subject to the Hazardous Materials Transportation Act, California Public Resources Code, and other State and local regulations that would limit the use of hazardous materials and reduce the associated risks of exposure. As such, the proposed project would not emit hazardous emissions or handle hazardous materials within 0.25 mile of a school. Therefore, construction impacts related to hazardous emissions proximate to a school would be less than significant.

Operation

The project site is not located within 0.25 mile of a school. In addition, the proposed project would not be expected to include industrial or retail development that involves hazardous materials such as gas stations, paint stores, or auto parts stores. Unlike industrial or retail facilities, residential

development does not involve the type or quantity of hazardous materials that could pose a significant environmental accident. Therefore, operational impacts related to hazardous emissions proximate to a school would be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

Government Code Section 65962.5 Sites

Impact HAZ-4:	**The proposed project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.**

Impact Analysis

The project site is not listed on any hazardous materials databases compiled pursuant to Government Code Section 65962.5. The State of California databases, including GeoTracker and EnviroStor, did not identify any locations of hazardous waste sites on the project site. Therefore, a less than significant impact would occur.

Additionally, the proposed project would not result in, or otherwise exacerbate, impacts on other sites included on a list of hazardous materials that may result in a significant hazard to the public or environment. The GeoTracker database showed four cleanup sites surrounding the project area. One open but inactive cleanup program site is identified and is located 1,300 feet northeast of the proposed project site, at Dublin Boulevard and Silvergate Drive; the potential contaminants of concern were not specified in the database. The GeoTracker website included one completed cleanup site identified as Hexcel Corp (Case #01S0086), located at 11711 Dublin Boulevard in Dublin, approximately 1,300 feet north of the proposed project site; the case was closed on January 1, 2008. An inactive tiered permit site identified as Hexcel Corp Technology Center is located approximately 3,000 feet northeast of the site of the proposed project. Tiered permitting is a State program for hazardous waste treatment and storage.[24] Lastly, a LUST cleanup site (Case #RO0003005) is located at 11759 Dublin Boulevard, Dublin, approximately 3,420 feet from the proposed project. The LUST case involved three USTs that were discovered and subsequently removed, and the case was closed on August 6, 2015.

The proposed project would not exacerbate or otherwise impact conditions on the cleanup sites that were identified as these sites are inactive or closed and do not pose a hazard to the proposed project area. Furthermore, these sites are not within a close proximity of the proposed project area.

[24] Sacramento County Environmental Management. 2025. Tiered Permitting. Website: https://emd.saccounty.net/EC/CUPA/Pages/TieredPermitting.aspx. Accessed February 28, 2025.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

Proximity to Public Airport Safety Hazard

Impact HAZ-5:	**For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, the proposed project would not result in a safety hazard or excessive noise for people residing or working the project area.**

Impact Analysis

The proposed project would not be located within an airport land use plan or within 2 miles of a public airport. The nearest major airport to the project site is Livermore Municipal Airport, approximately 7.10 miles to the east. The project site does not fall within the Sphere of Influence of the Livermore Municipal Airport or any other airport. Therefore, no impact related to exposure of people to safety hazards or excessive noise in proximity to an airport would occur.

Level of Significance Before Mitigation

No impact.

Mitigation Measures

None.

Emergency Response and Evacuation

Impact HAZ-6:	**The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.**

Impact Analysis

The City has several emergency plans regarding public safety and emergency evacuations, including the General Plan Safety Element, EOP, Emergency Management Plan (EMP), and Local Hazard Mitigation Plan. The EMP provides safety measures for the community in the event of a natural disaster (earthquake, flood, or fire), human-caused emergencies, or hazardous materials spill. The EMP provides a framework for coordination of response and recovery efforts within the City in coordination with local, State and federal agencies. The City's General Plan Safety Element also provides information, policies, and programs directed toward reducing the potential for human injury and loss of life and to minimize property damage and economic and social disruption due to natural and human-made hazards. The City's EOP is an extension of the State of California Emergency Plan, and its concepts are used to coordinate localized emergencies as well as catastrophic disasters.

The General Plan considers the site a Special Fire Protection Area, meaning that the area is greater than five minutes of travel time from the closest fire station. Special Fire Protection Areas are

required to comply with additional building code and fire code requirements due to the distance from the nearest fire station, which is Station No. 2 at 6300 Stoneridge Mall Road, with a Euclidian (straight-line) distance of 1.55 miles east of the project site. According to Google Maps, Dublin Canyon Road is a 7-minute drive (3.6 miles) from Station No. 2 in favorable traffic conditions. Compliance with the Special Fire Protection Area requirements for areas that are more than 5 minutes from the nearest fire station would allow the area to be adequately served by existing fire services.

Furthermore, the proposed residential units would be required to be constructed in compliance with the California Fire Code with regard to access and building materials such as tile or other fire-resistant roofing. All driveways and internal roadways would be designed in accordance with the City's Standards and Specifications guidebook to accommodate large emergency vehicles such as fire engines. Access to the site is available from an interchange with I-580 at Foothill Road and from Dublin Canyon Road. The proposed project would include improvements and widening of Dublin Canyon Road to accommodate large emergency vehicles.

Pleasanton EOP, Pleasanton EMP, Local Hazard Mitigation Plan, and the Safety Element of the General Plan do not list emergency evacuation routes. I-580 would be the most likely evacuation route to be used in case of an emergency. The proposed project would not interfere with evacuation along I-580 or otherwise conflict with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

Level of Significance After Mitigation

Less than significant impact.

Wildland Fires

Impact HAZ-7:	**The proposed project would not expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires.**

Impact Analysis

According to the City of Pleasanton General Plan Safety Element, urban and wildland fires pose a significant risk to life and property. Special Fire Protection Areas occur at the wildland-urban interface and are affected by fuel, climate, and topography. For example, fires tend to burn more rapidly upward on steep slopes. The proposed project is located in a Special Fire Protection Area, according to the General Plan Safety Element.

According to CAL FIRE, the project site is located in a High Fire Hazard zone. Project structures would be required to comply with the California Fire Code with regard to emergency access and types of building materials. The proposed project would also comply with the City's General Plan and

Municipal Code requirements. Special Fire Protection Areas are required to comply with additional building code and fire code requirements due to the distance from the nearest fire station and increased risk of wildland fires due to topography, fuel, and climate factors. Station No. 2 at 6300 Stoneridge Mall Road is the nearest fire station, with a Euclidian (straight-line) distance of 1.55 miles east of the project site and a driving distance of 3.6 miles, or 7 minutes. The proposed project would comply with the additional requirements for a Special Fire Protection Area.

Compliance with the City of Pleasanton's requirements for Special Fire Protection Areas and areas that are more than 5 minutes from the nearest fire station would allow the area to be adequately served by existing fire services. At a minimum, automatic fire sprinkler systems are required in these areas. Other requirements include adequate fire flow, which is the amount of water expressed in gallons per minute available to control a given fire. Standards for adequate fire flow are set nationally and by the City of Pleasanton. According to the General Plan Safety Element, additional mitigation measures can include fire-resistant construction, early warning fire detection systems, access and setback requirements to facilitate firefighters' entry, and fire separation. Fire protection measures are provided in the Pleasanton Municipal Code in four sections: the Building Code, the Fire Code, the Zoning Ordinance, and the Subdivision Ordinance.

Compliance with required fire protection measures in the Pleasanton Municipal Code and the California Fire Code would reduce the risk of loss, injury, or death due to wildland fires to less than significant levels.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

3.8.7 - Cumulative Impacts

The general geographic scope of the cumulative impact analysis for hazards and hazardous materials is the East County area. This analysis evaluates whether the impacts of the proposed project, together with the impacts of cumulative development identified in Table 3-1 of Chapter 3, Environmental Impact Analysis, of this Draft EIR, would result in a cumulatively significant impact related to hazards and hazardous materials. This analysis then considers whether incremental contribution to cumulative impacts associated with the implementation of the proposed project would be significant. Both conditions must apply for a project's cumulative effects to rise to a level of significance. Impacts from hazards and hazardous materials are generally site-specific and typically do not combine with impacts from cumulative projects to result in significant cumulative impacts. New developments in the vicinity of the proposed project site would be subject to the same regulatory requirements as the proposed project. As such, large or unexpected releases of hazardous materials of the type that would contribute to significant cumulative impacts would not be expected. In addition, compliance with existing federal, State, and local regulations regarding the treatment and management of hazardous materials would ensure that the proposed project would not combine with cumulative projects in the vicinity to result in a significant cumulative impact.

Routine, Transport, Use, or Disposal of Hazardous Materials

The geographic scope of the cumulative impact analysis for the routine, transport, use, and disposal of hazardous materials is the vicinity of the project site. The cumulative projects would implement construction activities such as demolition of existing structures, if necessary; ground-disturbing activities; and the use of construction equipment. Construction activities would involve the transport, use, and disposal of hazardous materials, including diesel fuels, paints, cements, aerosols, and potentially hazardous building materials and contaminated soils that may be situated on each project site. The transport of such materials may lead to a cumulatively considerable increase in creating a significant hazard to the public and environment. However, there are no cumulative projects within the immediate vicinity of the proposed project that could contribute to a potential construction-related cumulative impact. Accordingly, cumulative impacts would be less than significant.

Nevertheless, past, present and reasonably foreseeable projects and the proposed project would be required to abide by the same federal, State, and regional regulations pertaining to implementing precautionary measures toward the transporting, handling, usage, storage, and disposal of hazardous materials, including those from the Hazardous Materials Transportation Act, California Code of Regulations, and Health and Safety Code. As such, the transportation, handling, and disposal of any contaminated soil or other hazardous building materials on the project site during construction would not have an incremental contribution to the cumulatively considerable impact. Additionally, the proposed project would implement MM HAZ-1, which requires the applicant to conduct asbestos and lead paint surveys prior to demolition activities and to safely remove and dispose of any such materials in accordance with State standards Therefore, the cumulatively considerable impact related to creating hazards through the transport, use, and disposal of hazardous materials during the construction phase of each project would be less than significant and the proposed project's incremental contribution would be less than significant.

Development of the proposed project would not result in significant increased risks of hazards in the cumulative setting area, nor would it result in any significant off-site or indirect impacts. Development of the proposed project would have a less than significant cumulative impact relative to this environmental topic. As such, impacts related to hazards and hazardous materials would result in a less than cumulatively considerable contribution.

Risk of Upset

The geographic scope of the cumulative impact analysis for the risk of upset of hazardous materials is the vicinity of the project site. Construction activities associated with cumulative projects may result in reasonably foreseeable upset and accident conditions through the demolition of existing structures and ground-disturbing activities. However, all cumulative projects would be required to abide with the same federal, State, and local rules and regulations such as the Hazardous Materials Transportation Act, HSC, California Code of Regulations Title 8 Sections 1529 and 1532.1, and the BAAQMD District Rule 11-2. As such, the cumulatively considerable impact related to upset and accident conditions would have no impact. Furthermore, the project site has no history of Recognized Environmental Conditions (RECs), is not listed on hazardous materials sites, and was determined to not pose any subsurface contamination risk to the public or the environment.

Therefore, the proposed projects' incremental contribution to generating any upset or accident conditions during construction would have no impact. Lastly, the proposed project and the cumulative projects are residential projects, which only use hazardous materials that generate low risk to creating accident conditions. Since each cumulative project would be required to comply with the same regulations, and existing conditions on the project site were determined to not pose a risk to the public or environment, and hazardous materials use would be associated with residential uses, the cumulatively considerable impact related to the release of hazardous materials through accident conditions would have no impact and the proposed project's incremental contribution would have no impact.

Hazardous Emissions Proximate to a School

As previously discussed, the proposed project is not within 0.25 mile of a school. As such, the geographic scope of the cumulatively considerable impact of emitting or handling hazardous materials in proximity to a school would be within 0.25 mile of the surrounding schools. There are no cumulative projects within the geographic scope as the nearest cumulative project. Although the construction of cumulative projects could transport hazardous materials in proximity to the surrounding schools, and future foreseeable development could occur within vacant lots in proximity to the project site and within 0.25 mile of the surrounding schools, cumulative and any future projects would be required to comply with the same federal, State, and local regulations on the transportation and handling of hazardous materials. Therefore, the cumulatively considerable impact related to emitting or handling hazardous materials within 0.25 mile of a surrounding school would be less than significant.

Government Code Section 65962.5 Sites

The geographic scope of the cumulative impact analysis for being located on a Government Code Section 65962.5 site is the vicinity of the project site. The proposed project would have no impact with respect to hazardous materials site pursuant to Government Code 65962.5 and, therefore, would not contribute to any potential cumulative impact. Moreover, there are no cumulative projects located on a potential site within the relevant geographic scope. Since no cumulative project is in direct proximity to the project site and the proposed project is not listed on any hazardous materials site and has no history of environmental contamination, there would be no cumulatively considerable impact related to hazardous materials sites and the proposed project's incremental contribution would have no impact as it is not located on a hazardous materials site.

Proximity to Public Airport Safety Hazard

As explained in Impact HAZ-5, the nearest airport facility within the vicinity of the project site is the Livermore Municipal Airport, approximately 7.10 miles to the east. The project site does not fall within the Sphere of Influence of the Livermore Municipal Airport or any other airport. Accordingly, there would be no cumulative impact related to the proposed project being located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport. The proposed project would not result in a safety hazard or excessive noise for people residing or working the project area. Moreover, the proposed project would have no impact and, therefore, would not have any contribution to cumulative impacts.

Hazards and Emergency Response

Cumulative impacts related to emergency response and evacuation plans would be less than significant. The County has an EOP that is regularly updated. Adjacent jurisdictions also have emergency response plans and emergency evacuation plans. Furthermore, larger regional and Statewide resource areas are regulated by State agencies to address larger-scale Statewide issues. For these reasons, cumulative impacts associated with emergency response and evacuation plans are less than significant.

Additionally, new development under the proposed project would be considered in the context of the County's EOP and is not expected to impair implementation of or physically interfere with the County's EOP. Therefore, the proposed project's contribution to cumulative impacts would be considered less than significant.

Wildfires

According to CAL FIRE, the project site is located in a High Fire Hazard zone. Project structures would be required to comply with the California Fire Code with regard to emergency access and types of building materials. However, as with the proposed project, cumulative development in the region would be required to comply with all applicable regulations related to the provision of fire water, emergency access, and construction materials that would minimize and/or prevent fire loss and damage. Since the cumulative projects, including the proposed project, would adhere with the California Fire Code and CBC standards, the cumulatively considerable impact associated with direct or indirect exposure to wildland fires would have a less than significant cumulative impact. The proposed project's incremental contribution to direct or indirect exposure to wildland fires would be less than significant.

Level of Cumulative Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

3.9 - Hydrology and Water Quality

3.9.1 - Introduction

This section describes the existing hydrology and water quality setting and potential effects from project implementation on the site and its surrounding area. Descriptions and analysis in this section are based on the City of Pleasanton General Plan 2005–2025 (General Plan), 2020 City of Pleasanton Urban Water Management Plan (UWMP), information provided by the California Department of Water Resources, and review of the Bay Area Hydromodification Model Report prepared for the proposed project (Appendix F).

During the Environmental Impact Report (EIR) scoping period, one public comment was received related to the proposed project's potential hydrologic impacts.

- Concerns regarding water runoff from the project site.
- Request to analyze and address stormwater drainage in the project vicinity to reduce flooding.

3.9.2 - Environmental Setting

Surface Hydrology

Watershed

The City of Pleasanton (City) lies within the Eastern Alameda Creek Watershed, a drainage basin encompassing about 675 square miles between Mount Hamilton and Mount Diablo. Each stream, tributary, and reservoir within this area has its own smaller watershed that ultimately feeds into Alameda Creek. Alameda Creek flows northwest from its origin on Mount Hamilton until it meets the Arroyo de la Laguna near Sunol and then runs west through Niles Canyon to San Francisco Bay. The Arroyo de la Laguna collects the surface water runoff from the Tri-Valley and carries it south to Alameda Creek.[1]

The Alameda County Flood Control and Water Conservation District Zone 7 (Zone 7 Water Agency [Zone 7]) is responsible for providing water and flood control to the Livermore-Amador Valley. The actual source of the Zone 7 water depends upon the time of year and rainfall levels and is made up of a blend of different sources, including the following:

- ***State Water Project*:** The State Water Project is a system of reservoirs, canals, pipelines, and pump stations that transport water throughout California.
- ***Local Surface Water and Groundwater*:** Local surface water comes from rain runoff in the watershed that flows into the Del Valle Reservoir from the surrounding hills and valley, where it is stored for later use. Groundwater comes from the Livermore-Amador Valley groundwater basin through groundwater recharge. Water naturally percolates into the basin from rainfall and stream flow within the watershed. Extra surface water is also sometimes stored in the groundwater basin. Most of the basin recharge comes from water that percolates down into the ground as it flows through the arroyos. Zone 7 stores surface water in the groundwater

[1] City of Pleasanton. 2005. Proposed Pleasanton General Plan 2005–2025 Draft Environmental Impact Report, Hydrology Overview.

basin each winter and pumps that water back out each summer to supplement other supplies to meet demands.

- ***Supplemental Water*:** Zone 7 also purchases water from Byron Bethany Irrigation District.

Surface Water

The City is in the Livermore planning watershed of the Alameda Creek Hydrologic Subarea, in the South Bay Hydrologic Unit in Alameda County. The Alameda Creek watershed covers an area of 633 square miles. There are several seasonal and perennial surface water bodies within this subarea, as described below.

Arroyo las Positas

The Arroyo las Positas is a major drainage feature of the Livermore Valley and drains approximately 51,000 acres. Summer flows are a combination of irrigation, urban flows, and agricultural runoff, all of which keep the Arroyo las Positas as a perennial creek. The Arroyo las Positas begins in the Altamont Hills east of Livermore and flows westward to its confluence with the Arroyo Mocho.

Tassajara Creek

Tassajara Creek flows from north to southwest, through the City of Dublin, crossing under Interstate 580 (I-580) into the City of Pleasanton at Old Santa Rita Road. After continuing under I-580, Tassajara Creek flows for approximately 1 mile south before reaching its confluence with the Arroyo Mocho. South of I-580, Tassajara Creek flows are maintained by shallow groundwater aquifer seepage into the stream channel.

Arroyo Mocho

The Arroyo Mocho flows in an east to west and northwest direction through the Chain of Lakes area, then turns in a southwesterly direction west of El Charro Road to its confluence with the Alamo Canal near I-680. The channel is trapezoidal in shape, with levees along its upper length within the watershed. The Arroyo Mocho drains approximately 36,000 acres (56.2 square miles) of mixed agriculture, urban, and undeveloped lands starting in Santa Clara County, where it flows generally to the northwest. Because of the regional Mediterranean climate, flow within the Arroyo Mocho is variable; summer flows are low and often depend upon releases from Zone 7 storage facilities for groundwater recharge to the Chain of Lakes system. This arroyo may run dry during the summer.

Alamo Canal and South San Ramon Creek

Alamo Canal is a trapezoidal flood control channel that carries flows from South San Ramon Creek and Alamo Creek (north of Pleasanton in the cities of San Ramon and Dublin) into the Arroyo de la Laguna. This canal runs for approximately 3 miles from the I-680/I-580 interchange, parallel to I-680. This is notated as South San Ramon Creek.

Arroyo del Valle

The Arroyo del Valle is an unchannelized stream that originates at the Del Valle Reservoir and flows west through unincorporated Alameda County and Shadow Cliffs Regional Recreation Area and continues to meander through the City of Pleasanton to its confluence with the Arroyo de la Laguna and Alamo Canal. A distinctive riparian corridor is present on both sides of the stream channel.

Chain of Lakes

The Chain of Lakes is a series of former gravel pits that are currently being improved for stormwater retention/flood control and groundwater recharge. Water from the Arroyo Mocho is released periodically into the Chain of Lakes area. The Arroyo Mocho flows through the Tri-Valley and near the Chain of Lakes but is separated from it by levees. Surface water does not flow out of the Chain of Lakes area; thus, the area is not considered part of the Arroyo Mocho Watershed.[2]

Project Site

The project site is bordered by Devany Creek in the southeast.

Surface Water Quality

Both Zone 7 and the City operate extensive water quality monitoring programs that the agencies have continually updated and refined over the last decade. Neither agency has detected any significant levels of volatile organic compounds (VOC) or contaminants in the water supply. In addition, Pleasanton's water quality complies with all federal and State drinking water quality standards.

The San Francisco Bay Regional Water Quality Control Board (RWQCB) has characterized the Arroyo de la Laguna, Arroyo las Positas, Arroyo del Valle, Arroyo Mocho, and Alameda Creek as impaired by diazinon. Diazinon is a pesticide used on a variety of agricultural crops and formerly used on residential gardens and lawns. As of December 31, 2004, the United States Environmental Protection Agency (EPA) no longer permitted its sale for nonagricultural uses. Because of the ban, the diazinon levels in the creeks entering the Bay have diminished.[3]

The Lower San Francisco Bay is listed as impaired by chlordane, dichlorodiphenyltrichloroethane (DDT), dieldrin, and mercury from nonpoint sources; by dioxin compounds, furan compounds, and mercury from atmospheric deposition; by exotic species from ballast water; and by polychlorinated biphenyls (PCBs) and dioxin-like PCBs from unknown nonpoint sources. Industrial and municipal point sources, resource extraction, and natural sources contribute to mercury degradation of the Lower San Francisco Bay.

The Zone 7 Surface Water Monitoring Program measured water quality within the Arroyo Mocho in June 2005. Table 3.6-1 of the General Plan lists concentrations of various constituents at monitoring sites from testing dates in 2005 as well as the applicable water quality criteria/regulations for surface water resources. Although water quality criteria are long-term thresholds rather than single measurement criteria, this information serves as an indicator of possible impairments. Constituents exceeding regulatory thresholds on the sampling dates included total dissolved solids, chloride, and nitrates.[4]

The Dublin San Ramon Services District (DSRSD) treats and monitors the City's sewage effluent by contract. The sewage treatment plant produces secondary effluent, which is pumped to the San

[2] City of Pleasanton. 2005. Proposed Pleasanton General Plan 2005–2025. Draft Environmental Impact Report, Hydrology Overview.
[3] City of Pleasanton. 2005. 2005 Pleasanton General Plan 2025. Chapter 8 Water Element, Water Quality.
[4] City of Pleasanton. 2005. Proposed Pleasanton General Plan 2005–2025. Draft Environmental Impact Report, Surface Water Drainage.

Francisco Bay; tertiary effluent (also known as grey water), which is used primarily for landscape watering in commercial areas in the City of Dublin, as well as commercial landscaping and some public parks in Pleasanton; and sludge, which is decomposed and then buried nearby in the drying beds north of Stoneridge Drive. DSRSD monitors secondary effluent daily and monitors the sewage transport system for pH levels (a measure of acidity or alkalinity) and hydrogen sulfide. At its sewage ponds site, DSRSD operates numerous test wells that have shown no toxic material intrusion on the soil content.[5]

Groundwater

The City is located above the Livermore Valley Groundwater Basin. The general groundwater gradient is to the west, then south toward the Arroyo de la Laguna. Elevations within the basin range from about 600 feet above mean sea level (AMSL) in the east, near the Altamont Hills, to about 280 feet AMSL in the southwest, where the Arroyo de la Laguna flows into the Sunol Groundwater Basin area. The basin surface area is approximately 69,600 acres (108.8 square miles) and extends from the Altamont Hills and Greenville fault to the east to the Pleasanton and Main Ridges as well as the Calaveras fault on the west, and from the Orinda Upland south to the Livermore Upland fault. The two major faults, the San Andreas and Hayward Faults, prevent lateral groundwater movement. The basin storage capacity is estimated at approximately 500,000 acre-feet.

This groundwater basin is divided into two major basins based on geophysical properties: the Main Basin and Fringe Basin. These sources of groundwater co-mingle in the Bernal and Amador Subbasin and generally flow toward municipal or gravel mining company groundwater pumping wells. The southeastern region of the Livermore Valley is the most important groundwater recharge area and consists of mainly sand and gravel that was deposited by the ancestral Tulare Lake and current Arroyo del Valle and Arroyo Mocho.

Although all creeks feeding the Arroyo de la Laguna are naturally seasonal, Zone 7 releases both stored water from the Del Valle Reservoir and imported water from the South Bay Aqueduct into these creeks. These controlled water releases recharge the local groundwater basin underlying the potential sites for rezoning.

The groundwater basin includes several aquifers consisting of water-bearing gravel layers separated by impervious clay layers. Directly under flat portions of the City sits the greatest amount of usable groundwater in the main water basin.

Project Site

The project site does not contain any active groundwater wells. As previously discussed, the project site is located within the Livermore Valley Groundwater Basin.

Groundwater Depth

The depth to groundwater ranges between approximately 22 and 67 feet below ground surface, depending upon the groundwater subbasin.

[5] City of Pleasanton. 2005. 2005 Pleasanton General Plan 2025. Chapter 8 Water Element.

Groundwater Quality

The Main Basin is characterized by relatively good quality groundwater that meets all State and federal drinking water standards with only minimal treatment (chlorination to preserve quality in the distribution system). In general, the quality of water in the central portion of the Main Basin varies from fair to excellent. A number of wells are located within this area because of the potable quality of its water. The total dissolved solids content in the central portion of the Main Basin averages about 400 to 700 milligrams per liter. The Main Basin supports large-capacity municipal production wells and is used to store and distribute high-quality imported water through Zone 7's recharge program.

The groundwater in the Fringe Basin tends to be saltier than the Main Basin. Zone 7 has developed a salt management plan to identify and evaluate all significant salt loading to, and removal from, the groundwater basin. The Zone 7 monitoring indicates that groundwater used for potable water supplies meets regulatory goals for drinking water including those for arsenic, total chromium VI, chloride, total dissolved solids, hardness, chloramines, free ammonia, total trihalomethanes, and five haloacetic acids. Zone 7 has identified recharge of local streamflow and imported water, subsurface inflow, and irrigation returns as major contributors to increasing total dissolved solids (TDS) concentration. TDS in the local surface water varies significantly throughout the watershed from approximately 350 milligrams per liter (mg/L) TDS to more than 1,000 mg/L. The highest-quality surface water recharging the basin occurs through the Arroyo Mocho and Arroyo del Valle where the TDS is generally less than 500 mg/L. The poorest quality surface water recharging the basin has a TDS of approximately 1,000 mg/L and occurs in the Arroyo las Positas. Localized elevated groundwater nitrate levels are associated with livestock operations and septic tank usage in the central and eastern portions of the Livermore Valley.

Per- and Polyfluoroalkyl Substances

Per- and polyfluoroalkyl substances (PFAS) are a group of thousands of chemicals used since the 1940s to make commercial products including carpets, clothing, food packaging, and cookware because they are waterproof, stain-resistant, and non-stick; they also have been used in fire-retarding foam and various industrial processes. They can be introduced into the body through ingestion of contaminated food or liquid and inhaling or touching products with packaging treated with the substance. They can contaminate drinking water supplies when products containing PFAS are used or spilled on the ground and they migrate into groundwater, and, once in groundwater, PFAS can travel large distances and contaminate drinking water wells.

PFAs have recently been detected above regulatory requirements in portions of the Livermore-Amador Valley Groundwater Basin. This detection has made all of the City's groundwater wells non-operational.[6] On October 17, 2023 the City Council approved proceeding with the planning of new groundwater wells within the Bernal subbasin and on June 18, 2024, the City Council approved an agreement with Zone 7 to evaluate the feasibility of jointly construction and operating these new

[6] City of Pleasanton. 2025. Joint Groundwater Wells Project. Website: https://www.cityofpleasantonca.gov/our-government/pleasanton-water/joint-groundwater-wells-project/. Accessed October 21, 2025.

groundwater well. The Joint Groundwater Wells Project is currently within its first phase, which includes a feasibility assessment with a target completion by the end of 2025.

Project Site

The proposed project is located within the basin area under sustainable groundwater management by Zone 7 as per the Alternative Groundwater Sustainability Plan[7] for the Livermore Valley Groundwater Basin.

Flooding and Inundation

Flooding

The City's storm drainage system primarily consists of underground pipes, local channels, and natural swales in hillside areas. These facilities carry water runoff within the drainage basin to the flood control channels and creeks (known locally as arroyos). Developers of new projects are required to install on-site stormwater treatment infrastructure such as bioswales and bioretention basins in compliance with Provision C.3.g "Hydromodification Management" of Municipal Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit No. CAS612008, as well as adequately sized storm drains to connect to the City's existing underground storm drain network. The City also requires that hillside projects protect natural drainage courses and install silt basins/retention ponds for controlling pollutants and the runoff-flow rate. The City has required new developments to size their storm drains to accommodate major rainfalls.

As part of the National Flood Insurance Program (NFIP), the Federal Emergency Management Agency (FEMA) conducts nationwide flood hazard mapping to identify flood-prone areas and to reduce flood damages. The maps identify the flood of that magnitude that have a 1 percent annual chance of being equaled or exceeded, called the "100-year flood." The flood elevation associated with the 1 percent chance event is referred to as the base flood elevation. Areas predicted to be inundated in a 1 percent chance event are delineated on the Flood Insurance Rate Map (FIRM) and commonly referred to as the "100-year floodplain." Buildings and other structures in the 100-year flood plain must meet certain requirements to receive a floodplain development permit and to qualify for NFIP insurance and federally backed mortgages, and the City of Pleasanton Municipal Code (Municipal Code) has been regularly updated to reflect some of these evolving construction requirements (see Chapter 17.08 Flood Damage Prevention).Dam Inundation

Most of the City falls within the 5- to 40-minute inundation area in the event of a Del Valle Dam failure. In 2002, the City adopted an evacuation plan as an amendment to its Comprehensive Emergency Management Plan. It is unlikely that the Del Valle Dam will fail and result in the predicted inundation scenario. The Del Valle Dam failure inundation study, conducted in 1974, was likely performed using the worst-case situation: the situation where the dam failed from top to bottom when the reservoir was at capacity. A full reservoir could only occur during the 500-year storm event because the Del Valle Dam reservoir system was designed for up to the 500-year storm event.

[7] EKI Environment and Water. 2021. Alternative Groundwater Sustainability Plan for the Livermore Valley Groundwater Basin – Prepared for the Zone 7 Water Agency. December.

The Department of Water Resources continually monitors all State Water Project facilities and performs repairs and modifications as necessary to ensure safe, reliable water delivery. Engineers from the Division of Safety of Dams review instrumentation data and inspect jurisdictional State Water Project dams either semi-annually or annually. They evaluate proposed modifications to existing dams as well as the design and construction of new jurisdictional dams. The Del Valle Dam is a State Water Project facility and is inspected yearly by Operations and Maintenance and the Division of Safety of Dams.

Project Site

According to the FEMA FIRM, the project site is mapped within Zone X, indicating the project site is in an area of minimal flood hazard.[8] The project site is 17.6 miles east of the San Francisco Bay and 34.2 miles east of the Pacific Ocean. The 2021 Alameda County Local Hazard Mitigation Plan indicates that the project site is not at risk of being inundated by a tsunami, or a dam breach.[9]

3.9.3 - Regulatory Framework

Clean Water Act

The Clean Water Act (CWA) (33 United States Code [USC] § 1251, *et seq*.) is the major federal legislation governing the water quality aspects of construction and operation of the proposed project or variant. The CWA established the basic structure for regulating discharges of pollutants into waters of the United States (not including groundwater) and waters of the State. The objective of the CWA is "to restore and maintain the chemical, physical, and biological integrity of the nation's waters." The CWA establishes the basic structure for regulating the discharge of pollutants into waters of the United States.

The CWA authorizes the EPA to implement pollution control programs. Under the CWA, it is unlawful for any person to discharge any pollutant from a point source into navigable waters, unless an NPDES permit is obtained. In addition, the CWA requires each state to adopt water quality standards for receiving water bodies and to have those standards approved by the EPA. Water quality standards consist of designated beneficial uses for a particular receiving water body (e.g., wildlife habitat, agricultural supply, fishing), along with water quality objectives necessary to support those uses.

Responsibility for protecting water quality in California resides with the State Water Board and nine RWQCBs. The State Water Board establishes Statewide policies and regulations for the implementation of water quality control programs mandated by federal and State water quality statutes and regulations. The RWQCBs develop and implement water quality control plans (basin plans) that consider regional beneficial uses, water quality characteristics, and water quality problems. Water quality standards applicable to the proposed project are listed in the San Francisco Bay RWQCB Basin Plan.[10]

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[8] Federal Emergency Management Agency (FEMA). 2025. FEMA's National Flood Hazard Layer. Website: https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd. Accessed October 14, 2025.

[9] Alameda County. 2022. 2021 Alameda County Local Hazard Mitigation Plan. March.

[10] California State Water Resources Control Board (State Water Board). 2022. Website: https://www.waterboards.ca.gov/waterboards_map.html. Accessed October 14, 2025.

Section 303—Water Quality Standards and Total Maximum Daily Loads

Section 303(c)(2)(b) of the CWA requires states to adopt water quality standards for all surface waters of the United States based on the water body's designated beneficial use. Where multiple uses exist, water quality standards must protect the most sensitive use. Water quality standards are typically numeric, although narrative criteria based on biomonitoring methods may be employed where numerical standards cannot be established or where they are needed to supplement numerical standards.

CWA Section 303(d) requires states and authorized Native American Tribes to develop a list of water quality impaired segments of waterways. The list includes waters that do not meet water quality standards necessary to support a waterway's beneficial uses even after the minimum required levels of pollution control technology have been installed. Listed water bodies are to be priority ranked for development of a Total Maximum Daily Load (TMDL). A TMDL is a calculation of the total maximum daily load (amount) of a pollutant that a water body can receive on a daily basis and still safely meet water quality standards. The TMDLs include waste load allocations for urban stormwater runoff as well as municipal and industrial wastewater discharges, with allocations apportioned for individual Municipal Separate Storm Sewer Systems (MS4s) and wastewater treatment plants. For stormwater, load reductions would be required to meet the TMDL waste load allocations within the 20 years required by the TMDLs.

The State Water Board, RWQCBs, and EPA are responsible for establishing TMDL waste load allocations and incorporating approved TMDLs into water quality control plans, NPDES permits, and Waste Discharge Requirements (WDRs) in accordance with a specified schedule for completion. The San Francisco Bay RWQCB develops TMDLs for the Contra Costa County Area.

Section 401—Water Quality Certification

Section 401 of the CWA requires compliance with State water quality standards for actions within State waters. Under CWA Section 401, an applicant for a Section 404 permit (to discharge dredged or fill material into waters of the United States) must first obtain a certificate from the appropriate agency stating that the fill is consistent with the State's water quality standards and criteria. In California, the State Water Board delegates authority to either grant water quality certification or waive the requirements to the nine RWQCBs. The San Francisco Bay RWQCB is responsible for the project site.

Section 402—National Pollutant Discharge Elimination System Permits

The RWQCBs administer the NPDES stormwater permitting program, under Section 402(d) of the federal CWA, on behalf of EPA. The objective of the NPDES program is to control and reduce levels of pollutants in water bodies from discharges of municipal and industrial wastewater and stormwater runoff. CWA Section 402(d) establishes a framework for regulating nonpoint-source stormwater discharges (33 USC 1251). Under the CWA, discharges of pollutants to receiving water are prohibited unless the discharge complies with an NPDES permit. The NPDES permit specifies discharge prohibitions, effluent limitations, and other provisions, such as monitoring deemed necessary to protect water quality based on criteria specified in the National Toxics Rule (NTR), the California Toxics Rule (CTR), and the Basin Plan.

Discharge prohibitions and limitations in an NPDES permit for wastewater treatment plants are designed to maintain public health and safety, protect receiving water resources, and safeguard the water's designated beneficial uses. Discharge limitations typically define allowable effluent quantities for flow, biochemical oxygen demand, total suspended matter, residual chlorine, settleable matter, total coliform, oil and grease, pH, and toxic pollutants. Limitations also typically encompass narrative requirements regarding mineralization and toxicity to aquatic life. Under the NPDES permits issued to a city/county to operate the treatment plants, the city/county is required to implement a pretreatment program. This program must comply with the regulations incorporated in the CWA and the General Pretreatment Regulations (Code of Federal Regulations [CFR] Title 40, Part 403 [40 CFR 403]).

Section 401—Water Quality Certification

Section 404 of the CWA regulates temporary and permanent fill and disturbance of wetlands and waters of the United States. Under Section 404, the discharge (temporary or permanent) of dredged or fill material into waters of the United States, including wetlands, typically must be authorized by the United States Army Corps of Engineers (USACE) through either the Nationwide Permit (general categories of discharges with minimal effects) or the Individual Permit.

River and Harbors Act Section 10

Section 10 of the Rivers and Harbors Act of 1899 requires that regulated activities conducted below the ordinary high-water elevation of navigable waters of the United States be approved and permitted by the USACE. Regulated activities include the placement or removal of structures, work involving dredging, disposal of dredged material, filling, excavation, or any other disturbance of soils/sediments or modification of a navigable waterway. Navigable waters of the United States are those waters of the United States that are subject to the ebb and flow of the tide shoreward to the mean high-water mark and/or are presently used, or have been used in the past, or may be susceptible to use to transport interstate or foreign commerce. Section 10 also regulates tributaries and backwater areas that are associated with navigable waters of the United States and are located below the ordinary high-water elevation of the adjacent navigable waterway.

A project proponent can apply for a permit/letter of permission for work regulated under Section 404 (CWA) and Section 10 (Rivers and Harbors Act) by completing and submitting one application form. An application for a USACE permit will serve as an application for both Section 404 and Section 10 permits.

Federal Antidegradation Policy

The federal antidegradation policy is designed to protect existing water uses, water quality, and national water resources. The federal policy directs states to adopt a statewide policy that includes the following primary provisions:

- Existing instream uses and the water quality necessary to protect those uses shall be maintained and protected.

- Where existing water quality is better than necessary to support fishing and swimming conditions, that quality shall be maintained and protected unless the state finds that allowing lower water quality is necessary for important local economic or social development.
- Where high-quality waters constitute an outstanding national resource, such as waters of National Parks and State Parks, wildlife refuges, and waters of exceptional recreational or ecological significance, that water quality shall be maintained and protected.

National Toxics Rule and California Toxics Rule

In 1992, the EPA promulgated the NTR under the CWA to establish numeric criteria for priority toxic pollutants for 14 states to bring all states into compliance with the requirements of CWA Section 303(c)(2)(B). The NTR established water quality standards for 42 pollutants not covered under California's Statewide water quality regulations at that time. As a result of the court-ordered revocation of California's Statewide basin plans in September 1994, the EPA initiated efforts to promulgate additional federal water quality standards for California. In May 2000, the EPA issued the CTR, which includes all the priority pollutants for which the EPA has issued numeric criteria not included in the NTR.

Executive Order 11988

Executive Order 11988, "Floodplain Management," directs all federal agencies to avoid, to the extent possible, long- and short-term adverse impacts of occupancy and modification of floodplains and to avoid supporting development in a floodplain either directly or indirectly wherever there is a practicable alternative. Compliance requirements are outlined in 23 Code of Federal Regulations 650, Subpart A, "Location and Hydraulic Design of Encroachment on Floodplains."

If a proposed project involves significant encroachment into the floodplain, the final environmental document must include:

- The reasons why the proposed action must be located in the floodplain,
- Alternatives considered and the reasons they were not practicable, and
- A statement indicating whether the action conforms to applicable State or local floodplain protection standards.

Federal Emergency Management Agency

The National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973 were enacted to reduce the need for flood protection structures and limit disaster relief costs by restricting development in floodplains. FEMA, established in 1979, is responsible for predicting hazards from flooding events and forecasting the level of inundation under various conditions. As part of its duty to develop standards for delineating fluvial and coastal floodplains, FEMA provides information on FIRMs about the potential for flood hazards and inundation and, where appropriate, designates regions as special flood hazard areas. Special flood hazard areas are defined as areas that have a 1 percent chance of flooding in a given year.

FEMA also administers the NFIP, a federal program that enables property owners in participating communities to purchase insurance as protection against flood losses in exchange for state and community floodplain management regulations that reduce future flood damages.

State

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act of 1969 (Porter-Cologne Act) is California's statutory authority for the protection of water quality. Under the Porter-Cologne Act, the State must adopt water quality policies, plans, and objectives that protect the State's waters for the use and enjoyment of the people. Regional authority for planning, permitting, and enforcement is delegated to the nine RWQCBs. The RWQCBs are required to formulate and adopt basin plans for all areas in the region and establish water quality objectives in the plans. The Porter-Cologne Act sets forth the obligations of the State Water Board and RWQCBs to adopt and periodically update basin plans. The San Francisco Bay RWQCB is responsible for the project site.

Basin plans are the regional water quality control plans required by both the CWA and the Porter-Cologne Act that establish beneficial uses, water quality objectives, and implementation programs for each of the nine regions in California. The Porter-Cologne Act also requires waste dischargers to notify the RWQCBs of their activities by filing reports of waste discharge and authorizes the State Water Board and RWQCBs to issue and enforce WDRs, NPDES permits, CWA Section 401 water quality certifications, or other approvals. The RWQCBs are also authorized to issue waivers to reports of waste discharge and WDRs for broad categories of "low threat" discharge activities that have minimal potential to cause adverse water quality effects when implemented according to prescribed terms and conditions.

National Pollutant Discharge Elimination System

The NPDES permits all involve similar processes, which include submitting notices of intent for discharging to water in areas under the San Francisco Bay RWQCB's jurisdiction and implementing Best Management Practices (BMPs) to minimize those discharges. The San Francisco Bay RWQCB may also issue site-specific WDRs, or waivers to WDRs, for certain waste discharges to land or waters of the State.

Construction Activity

The State Water Board stormwater general permit for construction activity (Order 2009-009-DWQ, as amended by Order Nos. 2010-0014-DWQ and 2012-0006-DWQ) applies to all construction activities that would disturb 1 acre of land or more. Construction activities subject to the general construction activity permit include clearing, grading, stockpiling, and excavation. Dischargers are required to eliminate or reduce non-stormwater discharges to storm sewer systems and other waters.

Through the NPDES and WDR processes, the State Water Board seeks to ensure that the conditions at a project site during and after construction do not cause or contribute to direct or indirect impacts on water quality (i.e., pollution and/or hydromodification) upstream and downstream. To comply with the requirements of the Construction General Permit, the project applicant must file a notice of

intent with the State Water Board to obtain coverage under the permit; prepare a Storm Water Pollution Prevention Plan (SWPPP); and implement inspection, monitoring, and reporting requirements appropriate to the project's risk level as specified in the SWPPP. The SWPPP includes a site map, describes construction activities and potential pollutants, and identifies BMPs that will be employed to prevent soil erosion and discharge of other construction-related pollutants that could contaminate nearby water resources, such as petroleum products, solvents, paints, and cement. The permit also requires the discharger to consider using post-construction permanent BMPs that will remain in service to protect water quality throughout the life of the project. All NPDES permits also have inspection, monitoring, and reporting requirements.

Project sites served by the combined sewer system are not required to obtain coverage under the NPDES Construction General Permit.

Industrial General Stormwater Permit

The Statewide stormwater NPDES permit for general industrial activity (Order 2014-0057-DWQ, superseding Order 97-03-DWQ) regulates discharges associated with 10 broad categories of industrial activities, such as operation of wastewater treatment works, and recycling facilities. The industrial general permit requires the implementation of Best Available Technology Economically Achievable and Best Conventional Pollutant Control Technology to achieve performance standards. The permit also requires development of a SWPPP that identifies the site-specific sources of pollutants and describes the measures at the facility applied to reduce stormwater pollution. A monitoring plan is also required.

Stormwater

In November 1990, the EPA published regulations establishing NPDES permit requirements for municipal and industrial stormwater discharges. Phase I of the permitting program applied to municipal discharges of stormwater in urban areas where the population exceeded 100,000 persons. Phase II of the NPDES stormwater permit regulations, which became effective in March 2003, required that NPDES permits be issued for construction activity for projects disturbing 1–5 acres. Phase II of the municipal permit system (known as the NPDES General Permit for Small MS4s, Order No. 2003-0005-DWQ as amended by 2013-0001-DWQ) required small municipalities of fewer than 100,000 persons to develop stormwater management programs. This permit authorizes discharges of stormwater and some categories of non-stormwater that are not "significant contributors of pollutants."

California Toxics Rule and State Implementation Policy

The CTR, presented in 2000 in response to requirements of EPA's NTR, establishes numeric water quality criteria for approximately 130 priority pollutant trace metals and organic compounds. The CTR criteria are regulatory criteria adopted for inland surface waters, enclosed bays, and estuaries in California that are on the CWA Section 303(c) list for contaminants. The CTR includes criteria for the protection of aquatic life and human health. Human health criteria (water- and organism-based) apply to all waters with a municipal and domestic water supply beneficial use designation as indicated in the basin plans. The Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California, also known as the State Implementation Policy

(SIP), was adopted by the State Water Board in 2000. It establishes provisions for translating CTR criteria, NTR criteria, and Basin Plan water quality objectives for toxic pollutants into:

- NPDES permit effluent limits,
- Effluent compliance determinations,
- Monitoring for 2,3,7,8-tcdd (dioxin) and its toxic equivalents,
- Chronic (long-term) toxicity control provisions,
- Site-specific water quality objectives, and
- Granting of effluent compliance exceptions.

The goal of the SIP is to establish a standardized approach for permitting discharges of toxic effluent to inland surface waters, enclosed bays, and estuaries throughout the State.

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA) was passed in 2014, establishing a Statewide framework to protect and manage groundwater resources with local agencies responsible for managing their groundwater basins. Local agencies are required to form groundwater sustainability agencies (GSAs) for areas with a basin prioritization classification of medium or high priority and need to develop and implement a groundwater sustainability plan (GSP) outlining how groundwater in the region will be managed and address existing issues to achieve long-term sustainability within 20 years after implementation of the applicable GSP. The Livermore Valley Groundwater Basin is classified as having medium priority and is managed by the Zone 7 Water Agency, which updated its GSA for the basin in December 2021.

Local

City of Pleasanton

General Plan

The Pleasanton General Plan sets forth the following goals, policies, and programs that are relevant to hydrology and water quality:

Water Element

Goal 1 Preserve and protect water resources and supply for long-term sustainability.

Program 1.7 Require the installation of water conservation devices in new construction and additions.

Program 1.13 Plant drought-tolerant landscaping in appropriate locations. All landscaping aspects from plant selection to irrigation methods should be designed to reduce water demand, decrease runoff, and minimize impervious surfaces.

Program 2.8 Require that future developments result in no net loss of wetlands.

Water Quality

Policy 3 Protect the quality and quantity of surface water and groundwater resources in the General Plan Area.

Program 3.4 To preserve areas with prime percolation capabilities, regulate projects that use toxic chemicals including herbicides in water recharge areas, such as adjacent to arroyos.

Program 3.6 Prohibit new septic systems, automobile dismantlers, waste disposal facilities, industries utilizing toxic chemicals, and other potentially polluting uses in areas where pollution could impact flood waters, groundwater, streams, creeks, or reservoirs.

Program 3.7 To the extent compatible with the goal of maintaining water quality and public safety, retain water recharge areas, if feasible, as permanent open space accessible to the public.

Program 3.9 Support the policies and programs contained in the Water Quality Control Plan for the San Francisco Bay Basin to the extent they are consistent with the City's policies for water quality.

Program 3.11 Support Zone 7 in implementing its Stream Management Master Plan so as to protect and enhance the water quality of streams and groundwater.

Water Systems

Program 4.1 Require new development to pay for its fair share of the City's water system master plan improvements.

Program 4.5 Utilize water reclamation methods to the fullest extent feasible, where safe and nonpolluting.

Wastewater

Program 5.1 Require new development to pay its fair share of the City's planned sewer system improvements including treatment, distribution, reuse, and export facilities.

Stormwater Facilities

Goal 6 Minimize stormwater runoff and provide adequate stormwater facilities to protect property from flooding.

Program 8.1 Require new development to pay its fair share of the storm drainage system improvement costs.

Program 8.4 As determined by the City Engineer, require new development to improve local storm drainage systems to accept appropriate design-year flows resulting from new development.

Program 9.1 Require new development to pay its fair share of the flood control improvement costs included in Zone 7's Master Plan.

Goal 7 Reduce stormwater runoff and maximize infiltration of naturally-occurring rainwater so as to improve surface and subsurface water quality.

City of Pleasanton Municipal Code

The City has incorporated stormwater and stormwater quality regulations into its Municipal Code, including the following code chapters: Chapter 9.14 Storm Water Management and Discharge Control, Chapter 9.30 Water Conservation Plan, Chapter 13.04. Encroachments, Chapter 15.16 Connections to Sewerage Systems, Chapter 15:24 Sewer Service Regulations, Chapter 15.28 Sewer Use Regulations, Chapter 15.36 Wastewater Discharge Permits, Chapter 17.08 Flood Damage Protection, and Chapter 19.40 Improvements.

3.9.4 - Methodology

FirstCarbon Solutions (FCS) evaluated impacts on hydrology through, among other data and materials, review of the City of Pleasanton General Plan and 2020 UWMP and site plans. Agency websites were reviewed for relevant information about facilities and services provided. Balance Hydrologics conducted a peer review of the proposed project's Bay Area Hydrology Model (BAHM) Report to determine the adequacy of proposed hydrology and stormwater features.

3.9.5 - Thresholds of Significance

The Lead Agency utilizes the criteria in the California Environmental Quality Act (CEQA) Guidelines Appendix G Environmental Checklist to establish thresholds of significance to determine whether impacts to hydrology and water quality are significant environmental effects. As such, the City has determined that the proposed project would have a potential impact if it would:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

c) Substantially alter the existing drainage pattern of area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
   (i) result in substantial erosion or siltation on- or off-site;
   (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
   (iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
   (iv) impede or redirect flood flows.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

3.9.6 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the development of the proposed project and provides mitigation measures where appropriate.

Surface and Groundwater Quality

Impact HYD-1:	**The proposed project would not have the potential to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.**

Impact Analysis

Construction

The proposed project would consist of the development of 28 detached single-family residential units and roadways on approximately 23.89 acres, with 117.1 acres of open space. Grading activities could result in erosion and sedimentation. The accumulation of sediment could result in the blockage of flows, potentially causing increased localized ponding or flooding. Construction activities would require the use of gasoline- and diesel-powered heavy equipment, such as bulldozers, backhoes, water pumps, and air compressors. Chemicals such as gasoline, diesel fuel, lubricating oil, hydraulic oil, lubricating grease, automatic transmission fluid, paints, solvents, glues, and other substances could be used during construction. An accidental release of any of these substances could degrade the quality of the surface water runoff and adversely affect receiving waters.

The proposed project would disturb more than 1 acre of soil and therefore is required to obtain coverage under the State Water Board stormwater general permit for construction activity, 2009-0009-DWQ. As discussed in Section 3.9.3, Regulatory Framework, the objectives of a SWPPP are to identify pollutant sources that may be delivered off-site (in the form of runoff) and affect the quality of stormwater discharge; to implement site controls and practices to reduce stormwater pollution; and to protect water quality of receiving waters. The SWPPP would incorporate site-specific BMPs that would preserve and maintain stormwater management facilities, such as limited use of fertilizers and/or pesticides; inspection of pump during storm events to ensure proper operation and replacement of parts; and vault flow control through clearing of debris and sediment. The SWPPP would be subject to review and approval by the City. Implementation of a SWPPP and associated BMPs would reduce potential impacts related to violating water quality standards or waste discharge requirements. As such, impacts to water quality during construction would be less than significant.

Operation

The proposed project would add additional areas of impervious surfaces and could therefore increase the volume of pollutants that are typically associated with urban runoff into the stormwater. Operational activities would involve vehicle use, landscape maintenance, and routine maintenance of structures. Leaks of fuel or lubricants, tire wear, brake dust, and fallout from exhaust contribute petroleum hydrocarbons, heavy metals, and sediment that may result in the pollutant load in runoff being transported to receiving waters. Runoff from landscaped areas may contain residual pesticides and nutrients. Consequently, the long-term degradation of runoff water quality in downstream waterways could result from the implementation of the project. However, the proposed project would be required to comply with Municipal Code Chapter 9.14, also known as the

Stormwater Management and Discharge Control Ordinance. Chapter 9.14 requires implementation of BMPs and compliance with Construction General Permits. Design features would comply with the current NPDES permit and Clean Water Program Stormwater C.3 Guidebook.

The proposed project would be divided into 10 drainage management areas (DMAs), which would direct stormwater into 10 bioretention areas equipped with overflow risers to control stormwater flow rates and promote infiltration. Excess stormwater would be directed into the on-site storm drain system which would direct the flow into the existing 12-inch storm drain within Dublin Canyon Road. Included in the on-site storm drain system would be a new 24-inch storm drain proposed along Dublin Canyon Road, which would connect to the development site via 12-inch storm drains. An 18-inch storm drain is also proposed at the intersection of Street A and Street B and following Street A; 12- and 8-inch storm drains are proposed within Court C. A 12-inch storm drain is proposed to follow both the private and public roads surrounding lots 29 and 30, connecting the roads along Dublin Canyon Road. All proposed storm drainage facilities are sized and designed with sufficient capacity to serve the proposed project. As such, in addition to the proposed system, compliance with the Stormwater Management and Discharge Ordinance would ensure the implementation of stormwater quality control measures during operational activities to prevent pollutants from entering downstream waterways. Operational impacts would therefore be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

Groundwater Supply/Recharge

Impact HYD-2:	**The proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.**

Impact Analysis

Construction

Impacts related to depletion of groundwater supplies or interference with groundwater recharge are limited to operational impacts because any water utilized during construction would be temporary, and, as discussed in Impact HYD-1, the proposed project would comply with applicable stormwater requirements and incorporate BMPs to address water quality and control runoff from the project site; therefore, runoff would not be absorbed into the groundwater supplies. While dewatering is not expected to be required during project construction, such actions would be temporary and, therefore, would not substantially interfere with groundwater supplies, recharge, or management.

Operation

Water services for the proposed project would be provided by the City. The proposed project could lead to an increased demand for water, which could lead to an increase in demand for groundwater production. As described previously, the City currently receives its water from Zone 7. Zone 7's water supply comes from the State Water Project supply via the South Bay Aqueduct, water from local

watersheds via Lake Del Valle, and groundwater within the Livermore-Valley Groundwater Basin. The City also owns and operates three active groundwater wells in the Main Basin, which is a portion of the Livermore Valley Groundwater Basin. Through a mutual agreement with the Zone 7 Water Agency, the City of Pleasanton has a groundwater pumping quota (GPQ) of 3,500 acre-feet per year (AFY). The basin is not adjudicated and is not considered to be critically overdrafted. It is instead considered a medium-priority groundwater basin. As such, the basin is regulated under SGMA, and the preparation and implementation of a GSP is required. Adherence to the objectives and sustainability goals provided in the GSP would reduce impacts to groundwater quality within the Livermore District. As discussed above, the proposed project is located within the basin area under sustainable groundwater management by Zone 7 as per the Alternative Groundwater Sustainability Plan for the Livermore Valley Groundwater Basin. Thus, the proposed project would meet all applicable sustainable groundwater management actions as required.

Zone 7's groundwater extraction for its treated water system does not use the natural sustainable yield from the Main Basin; instead, the City pumps only water that has been recharged as part of Zone 7's artificial recharge program using its available surface water supplies. On average, Zone 7 plans to recharge about 9,200 AFY in the future, which means that Zone 7 can pump an equivalent 9,200 AFY from the Main Basin on average. Additionally, groundwater use would not be required by the proposed project. The operation of the proposed project would not interfere with Zone 7's artificial recharge program, and the implementation of the proposed storm drain system would ensure runoff produced from the proposed project is filtered through bioretention areas before infiltration, which would avoid groundwater contamination. As such, operational impacts would be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

Drainage Leading to Erosion/Siltation, Flooding, Additional Sources of Polluted Runoff, or Impedance of Flood Flows

Impact HYD-3: **The proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:**

- **i) result in substantial erosion or siltation on- or off-site;**
- **(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;**
- **(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or**
- **(iv) impede or redirect flood flows?**

Impact Analysis

As discussed above, stormwater from the project site would be drained by a 24-inch storm drain proposed along Dublin Canyon Road, which would connect to the development site via 12-inch storm drains. An 18-inch storm drain is also proposed at the intersection of Street A and Street B and following Street A; 12- and 8-inch storm drains are proposed within Court C. A 12-inch storm drain is proposed to follow both the private and public roads surrounding lots 29 and 30, connecting the roads along Dublin Canyon Road.

The proposed project would include approximately 322,163 square feet of new impervious surfaces. All on-site storm flow would be directed into 10 DMAs with associated bioretention areas. All excess runoff from these bioretention areas would be directed into the on-site storm drain system which would direct flow into the existing 12-inch storm drain line beneath Dublin Canyon Road. All proposed storm drainage facilities are sized and designed with sufficient capacity to serve the proposed project. According to the FEMA FIRM for the area, the project site is within Zone X, which indicates an area of minimal flood risk.

i) Erosion and Siltation

Construction

The proposed project would have a significant impact if it were to substantially alter the existing drainage pattern of the site in a manner that would result in substantial erosion or siltation on- or off-site. Such drainage effects could occur from grade changes at the project site, exposure of soils for periods of time during stormwater discharge, or alterations to creek beds. These types of changes would have a potentially significant impact to on-site drainage patterns.

The proposed project would involve grading and construction of a 23.89-acre portion of the project site that is currently primarily composed of pervious surfaces. Construction activity could result in substantial erosion or siltation, leading to drainage pattern alteration and the increased potential for polluted runoff to enter nearby water bodies, such as Lake I or Cope Lake. This would represent a potentially significant impact.

However, the proposed project would be required to comply with the regulations of its State Water Board stormwater general permit for construction activity. Additionally, the proposed project would be required to comply with construction-phase BMPs and requirements for erosion and sedimentation control plans, as outlined above. These BMPs may include scheduling and timing of grading (soil-disturbing) activities, timely revegetation of graded areas, use of hydroseed and hydraulic mulches, and installation of erosion control blankets. Sediment control may include properly sized detention basins, dams, or filters to reduce entry of suspended sediment into the storm drain system and watercourses and installation of construction entrances to prevent tracking of sediment onto adjacent streets. Pollution prevention practices may include designated washout areas or facilities, control of trash and recycled materials, covering of materials stored on-site, and proper location of and maintenance of temporary sanitary facilities.

Additionally, as described above, the proposed project would be required to design and implement a SWPPP to ensure that erosion, siltation, and flooding are prevented or minimized to the maximum extent feasible during construction. The SWPPP would include both structural (physical devices or

measures) and operational (timing of construction) BMPs that would prevent or reduce the discharge of pollutants directly or indirectly into waterbodies. Therefore, construction impacts related to alteration of drainage patterns resulting in erosion or siltation would be less than significant.

Operation

The proposed project would consist of the development of 28 detached single-family residential units and roadways on approximately 23.89 acres, with 117.1 acres of open space. As such, the majority of the 130.98-acre site would be left as undeveloped open space and existing drainage would not be modified. Construction of impervious surfaces would be limited the new residential area, roadways, and East Bay Regional Park District (EBRPD) staging area, and drainage would continue to be directed to existing natural drainages.

Development of the project site would still increase impervious surfaces compared to existing conditions. Thus, proposed project operation could result in increased amounts of stormwater runoff that could carry pollutants into nearby water bodies. However, the proposed project's bioretention areas would have sufficient capacity to serve the proposed project. The provision of the on-site stormwater infrastructure would ensure that the proposed project would not result in substantial erosion. Therefore, operational impacts related to alteration of drainage patterns resulting in erosion or siltation would be less than significant.

ii) Surface Runoff

Construction

As discussed under Impact HYD-1, the proposed project would implement a project-specific SWPPP and incorporate BMPs contained within to reduce the potential for water quality impacts related to erosion, sedimentation, and other construction-related pollutants that may result in surface runoff. As such, construction-related impacts would be less than significant.

Operation

The proposed project would result in the development of 23.89 acres of an approximately 130.98-acre site. The proposed project would increase the number of impervious surfaces by approximately 7.4 acres, thereby slightly increasing the amount of surface runoff. This increase could result in a potentially significant impact. However, as described above, the proposed project's bioretention areas would have sufficient stormwater capacity to serve the proposed project, preventing surface runoff. As such, the operation of the proposed project would not result in substantial on-site flooding. Therefore, the operational impact related to increased impervious surfaces in turn increasing the rate or amount of surface runoff resulting in flooding would be less than significant.

iii) Exceedance of Storm Drain Capacity

Construction

The proposed project would be required to implement a SWPPP as part of its State Water Board stormwater general permit for construction activity to ensure that additional sources of polluted runoff is prevented during construction. Thus, construction of the proposed project would not create or contribute runoff water that would provide substantial additional sources of polluted runoff.

Therefore, the construction impact related to additional sources of polluted runoff would be less than significant.

Operation

The proposed project would result in increased impervious surface area and increased runoff. Consistent with the County's NPDES permit and the Clean Water Program Stormwater C.3 Guidebook, Low Impact Development (LID) techniques are required to be implemented in order to treat stormwater runoff. LID techniques, such as bioretention areas, allow for stormwater infiltration into the soil and detain stormwater on-site in order to reduce peak flows and prevent erosion and siltation. Stormwater on the project site would be captured in 10 bioretention areas designed in accordance with all applicable standards with adequate capacity to accommodate stormwater flows at the project site. Because stormwater would be treated through bioretention areas to ensure no net increase in off-site stormwater flow, the proposed project would not result in an exceedance of storm drain capacity. Therefore, impacts would be less than significant.

iv) Flood Flows

Construction

Impacts related to impedance of flood flows would only occur during the operational phase of the proposed project. As such, no construction impedance of flood flow impacts would occur.

Operation

As described above, the project site is not within a flood hazard zone, and stormwater would be captured in bioretention areas on-site, which would be designed in accordance with all applicable standards with adequate capacity to accommodate the project site during storm events to ensure no net increase in off-site flow of stormwaters. Therefore, impacts would be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

Risk of Pollutant Release Due to Inundation

Impact HYD-4:	**The proposed project would not be located in a flood hazard zone, tsunami, or seiche zone, or risk release of pollutants due to project inundation.**

Impact Analysis

The project site is 17.6 miles east of the San Francisco Bay and 34.2 miles east of the Pacific Ocean. The project site would not be at risk of inundation from a dam breach or tsunami.

Construction

Potential pollutants stored on-site during construction would be stored in a manner consistent with the proposed project's NPDES mandated SWPPP, as well as applicable regulations by Occupational Safety and Health Administration (OSHA), Department of Hazardous Substances and Materials,

which prevent pollutant release. As described in detail below, the project site is not located in a tsunami or seiche zone. The project site is not located in a flood hazard zone. The proposed project would comply with all applicable requirements and regulations, such as NPDES and OSHA guidelines. Therefore, no construction-related impacts would occur.

Operation

As described above, the residential project site is not located in a flood hazard zone and is not likely to be inundated with flood flows that would result in the release of pollutants into surface waters. Moreover, the proposed project includes residential land uses, which do not represent the type of use that would otherwise degrade water quality (e.g., industrial land uses that utilize hazardous materials that could adversely affect water quality). Anticipated and potential pollutants generated by the proposed project would be limited to household items and normal and expected materials for the proposed land uses and include sediment, nutrients, pesticides, metals, pathogens, oil, and grease. These materials would be limited to personal use quantities. Additionally, the proposed stormwater drainage system would have sufficient capacity to serve the proposed project. Therefore, impacts related to flood hazards and pollutants would be less than significant.

A tsunami is a sea wave generated by an earthquake, landslide, volcanic eruption, or even by a large meteor hitting the ocean. An event such as an earthquake creates a large displacement of water resulting in a rising or mounding at the ocean surface that moves away from this center as a sea wave. Tsunamis generally affect coastal communities and low-lying (low-elevation) river valleys in the vicinity of the coast. The California Geological Survey (CGS) Tsunami Hazard Area Map does not show the project site as being located in a Tsunami Hazard Area.[11] Because the site is not identified as within a tsunami inundation area or low-lying flood-prone area and due to its elevation, the proposed project is not likely to experience impacts from a tsunami.

Seiches are changes or oscillations of water levels within a confined water body. Seiches are caused by fluctuation in the atmosphere, tidal currents, or earthquakes. The effect of this phenomenon is a standing wave that would occur when influenced by external causes. The closest large body of water to the project site that could be susceptible to a seiche is the San Francisco Bay. Because of elevation and distance, the likelihood that the proposed project would be affected by a seiche is low. Therefore, impacts related to inundation from a seiche would be less than significant.

Furthermore, the proposed project stormwater drainage system, including two bioretention areas, would have sufficient capacity to serve the proposed project. The stormwater system would be designed in accordance with all applicable standards with adequate capacity to accommodate the project site during storm events and ensure no net increase in off-site flow of stormwaters. Therefore, impacts would be less than significant.

[11] California Department of Conservation (DOC). 2025. Tsunami Hazard Area Map. Website: https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/?extent=-13660824.1095%2C4512285.6761%2C13543416.8341%2C4564415.7294%2C102100&utm_source=cgs+active&utm_content=alameda. Accessed October 14, 2025.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

Water Quality Control or Sustainable Groundwater Management Plans Consistency

Impact HYD-5: **The proposed project <would/would not> conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.**

Impact Analysis

Construction

The City is within the jurisdiction of the San Francisco Bay RWQCB. The RWQCB has established regulatory standards and objectives for water quality in San Francisco Bay in its Water Quality Control Plan for the San Francisco Bay Basin, commonly referred to as the Basin Plan. The proposed project would not conflict with the Basin Plan or the County's NPDES program. Given that proposed construction would disturb more than 1 acre of land, the proposed project would be required to comply with the terms of the State Water Board stormwater general permit for construction activity, which require the preparation and implementation of a SWPPP that includes BMPs to ensure reduction of pollutants from construction activities potentially entering surface waters. Therefore, construction impacts related to a water quality control plan or groundwater management plan consistency would be less than significant.

Operation

As discussed in Impact HYD-2, above, the City would provide water services to the proposed project. The City derives its water supply from a combination of groundwater and surface water purchased from Zone 7.[12] Groundwater supply is pumped from the Livermore Valley Groundwater Basin with a groundwater pumping quota set under the terms of the City's contract with Zone 7. The basin is not adjudicated and is not considered to be critically overdrafted. It is, instead, considered a medium-priority groundwater basin. As such, the basin is regulated under SGMA, and the preparation and implementation of a GSP is required. Adherence to the objectives and sustainability goals provided in the GSP would reduce impacts to groundwater quality within the City. The proposed project would not include groundwater use and would be supplied water via existing water supply infrastructure beneath Dublin Canyon Road. Additionally, as discussed above, the proposed project would meet all applicable sustainable groundwater management actions as required. Thus, the proposed project would not interfere substantially with groundwater supply. Therefore, impacts related to sustainable groundwater management would be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

[12] City of Pleasanton. 2021. 2020 Urban Water Management Plan. June.

Mitigation Measures

None.

3.9.7 - Cumulative Impacts

Cumulative impacts related to hydrology and water quality typically occur within a defined watershed. The project site is located in the Eastern Alameda Creek watershed. The Eastern Alameda Creek Watershed is a 675-square-mile watershed. Each stream, tributary, and reservoir within this area has its own smaller watershed that ultimately feeds into Alameda Creek. Alameda Creek flows northwest from its origin on Mount Hamilton until it meets the Arroyo de la Laguna near Sunol and then runs west through Niles Canyon to San Francisco Bay. The Arroyo de la Laguna collects the surface water runoff from the Tri-Valley and carries it south to Alameda Creek.[13] The cumulative analysis considers the foreseeable development projects listed in Chapter 3, Environmental Impact Analysis, Table 3-1, Cumulative Projects, in the City and the surrounding area, in addition to the proposed project.

Surface and Groundwater Quality

Cumulative development in the watershed, as identified in Table 3-1, Cumulative Projects, contributes to an incremental increase in impervious surfaces that could introduce pollutants that are typically associated with urban runoff into the stormwater system and/or contribute to cumulative flood conditions in the watershed. Cumulative development could also contribute to water quality impacts in the watershed from construction activities. Cumulative impacts would be less than significant because future cumulative development, infrastructure, and planning projects would be subject to local, State, and federal permit requirements and would be required to comply with applicable ordinances and policies, as well as other water quality regulations that control construction-related and operational discharge of pollutants in stormwater. The water quality regulations implemented by the RWQCB take a basin-wide approach and consider water quality impairment in a regional context that addresses the entire geographic context of the watershed. For example, the Construction General Permit ties receiving water limitations and Basin Plan objectives to terms and conditions of the permit, and the MS4 Permit works with all municipalities within the Eastern Alameda Creek Watershed to manage stormwater systems to be collectively protective of water quality. If a CWA 404 Permit is required, the USACE would have approval authority. For these reasons and because of the nature and types of surrounding development, existing stormwater infrastructure, and regulatory requirements, cumulative impacts related to water pollutants or flooding would be less than significant.

The proposed project's incremental contribution to less than significant cumulative impacts would not be cumulatively considerable. The proposed project would also be required to conform to applicable federal, State, and local policies that would reduce hydrology and water quality impacts to less than significant levels. More specifically, the proposed project would be required to comply with the terms of NPDES permits, including implementation of a SWPPP which would ensure reduction of pollutants from construction activities potentially entering surface waters. The proposed project's storm drainage system would have sufficient capacity to serve the proposed project and would

[13] City of Pleasanton. 2005. Proposed Pleasanton General Plan 2005-2025 Draft Environmental Impact Report, Hydrology Overview.

prevent untreated water from entering nearby surface and groundwater. As such, the proposed project would not result in significant water quality degradation, exceed storm drain capacity, require significant groundwater supplies, or affect groundwater quality. Therefore, the proposed project's incremental contribution to less than significant cumulative impacts related to hydrology and water quality would not be significant.

Groundwater Supply/Recharge

The geographic context for addressing cumulative impacts to groundwater supply and recharge is the City's service area. Cumulative projects could lead to an increased demand for water, which could lead to an increase in demand for groundwater production. While the City does obtain a portion of its water supply from groundwater, the City is projected to have sufficient supplies to meet projected demands in normal and dry hydrologic years for a 20-year time horizon.

Additionally, the water supply projections in the City's 2020 UWMP were conducted to account for future development, and all projects within its service area would be required to undergo individual review to determine whether the City would have sufficient water supplies during normal, dry, and multiple dry years with implementation of new development. Furthermore, the proposed project has the potential to reduce on-site groundwater recharge through additional impervious surfaces; however, much of the project site would remain pervious and on-site stormwater management infrastructure, such as bioretention basins, would allow for groundwater recharge. Jurisdictional water features in adjacent areas would remain undisturbed, further allowing groundwater recharge to continue. Therefore, cumulative impacts related to groundwater recharge and supply would be less than significant, and the proposed project's incremental contribution would not be cumulatively considerable.

Erosion/Siltation, Flooding, Additional Sources of Polluted Runoff, or Impedance of Flood Flows

Cumulative projects could have a significant impact if they were to substantially alter the existing drainage pattern in a manner that would result in substantial erosion or siltation. Such drainage effects could occur from grading changes at individual project sites, exposure of soils for periods of time during stormwater discharge, or alterations to creek beds. However, the nearest project is located 2.51 miles southeast of the project site and would be required to comply with the regulations of its NPDES permit. Additionally, any cumulative projects would be required to comply with construction-phase BMPs and requirements for erosion and sediment control plans.

These BMPs may include scheduling and timing of grading (soil-disturbing) activities, timely revegetation of graded areas, the use of hydroseed and hydraulic mulches, and installation of erosion control blankets. Sediment control may include properly sized detention basins, dams, or filters to reduce entry of suspended sediment into the storm drain system and watercourses and installation of construction entrances to prevent tracking of sediment onto adjacent streets. Pollution prevention practices may include designated washout areas or facilities, control of trash and recycled materials, covering of materials stored on-site, and proper location of and maintenance of temporary sanitary facilities. Because of the distance of the nearest cumulative project and with compliance with NPDES permit requirements and BMPs, cumulative impacts would be less than

significant. Additionally, the proposed project would be required to design and implement a SWPPP to ensure that erosion, siltation, and flooding are prevented or minimized during construction. The SWPPP would include both structural (physical devices or measures) and operational (timing of construction) BMPs that would prevent or reduce the discharge of pollutants directly or indirectly into waterbodies.

Additionally, during operation, implementation of the stormwater control plan would prevent erosion and siltation caused by stormwater flows in accordance with the County's NPDES. Therefore, construction and operation impacts related to alteration of drainage patterns resulting in erosion or siltation would be less than significant, and the proposed project would not have a cumulatively considerable contribution to less than significant impacts.

Impacts related to impedance of flood lows would only occur during operation. As such, no cumulative construction impedance of flood flow impacts would occur. Cumulative projects could increase the amount of new impervious surfaces. However, all cumulative development would be required to adhere to existing regulations to address stormwater management in a manner that ensures that flooding would not increase, and flood flows would not be redirected to other areas not currently prone to flooding. All cumulative projects would be required to include stormwater management features, and, therefore, cumulative impacts would be less than significant.

Additionally, the proposed project would not have a cumulatively considerable contribution to the less than significant cumulative impact. The proposed project's bioretention areas and stormwater collection infrastructure would have sufficient capacity to accommodate the proposed project during storm events to ensure no net increase in off-site flow of stormwaters. Therefore, the proposed project's contribution to cumulative impacts would be less than significant.

Risk of Pollutant Release Due to Inundation

Implementation and operation of the proposed project (as well as the cumulative projects listed in Table 3-1) would require conformance with State and federal regulatory requirements related to hydrology and water quality, including applicable elements of the CWA, NPDES, Porter-Cologne Act, FEMA floodplain standards, and RWQCB Basin Plan. These regulatory requirements constitute a regional basin-wide effort to implement hydrology and water quality protections. Accordingly, there is not a cumulative impact related to pollutant release due to inundation.

Moreover, the proposed project's contribution to this less than significant cumulative impact would not be cumulatively considerable. The residential project site is not located within a 100-year flood zone or other hazard area. As such, the proposed project is not expected to result in the release of pollutants due to flood flows. Therefore, impacts related to flood hazards and pollutants would be less than significant.

Water Quality Control or Sustainable Groundwater Management Plans Consistency

The RWQCB has established regulatory standards and objectives for water quality in San Francisco Bay in its Basin Plan. The cumulative projects listed in Table 3-1 would be subject to compliance with the Basin Plan and/or, as applicable, the County's NPDES program. Because conformance with these

requirements would be required for all cumulative projects, cumulative hydrology/water quality impacts would be less than significant. Moreover, the proposed project would not have a cumulative considerable contribution to this less than significant impact. The project site would be served by water services provided by the City. The City derives its water supply from a combination of groundwater and surface water purchased from Zone 7. Groundwater supply is pumped from the Livermore Valley Groundwater Basin, with a groundwater pumping quota set under the terms of the City's contract with Zone 7. The basin is not adjudicated and is not considered to be critically overdrafted. It is instead considered a medium-priority groundwater basin. As such, the basin is regulated under SGMA, and the preparation and implementation of a GSP is required. Adherence to the objectives and sustainability goals provided in the GSP would reduce impacts to groundwater quality within the City.

Thus, the proposed project would not interfere substantially with groundwater supply. Therefore, the proposed project's incremental contribution to impacts related to sustainable groundwater management would not be cumulatively considerable.

Level of Cumulative Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

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3.10 - Land Use and Planning

3.10.1 - Introduction

This section describes the existing land use and potential effects from project implementation on the project site and its surrounding area. Descriptions and analysis in this section are based on the City of Pleasanton General Plan (General Plan), City of Pleasanton Parcel Zoning Map, and Pleasanton Municipal Code.

During the Draft Environmental Impact Report (Draft EIR) Notice of Preparation (NOP) scoping period, no comments were received related to land use and planning:

3.10.2 - Environmental Setting

Land Use

The 128.50-acre development site and open space is located in unincorporated Alameda County, adjacent to the northwestern boundary of the City of Pleasanton (City). The development site and open space comprises five parcels (Assessor's Parcel Numbers [APNs]: 941-2500-002, 941-2500-003, 941-2600-002-06, and 941-2700-002). Two other parcels to on the southern portion of the project site include East Bay Regional Park District (EBRPD) easements (APNs 941-2600-2-8, 941-2600-2-9). As shown in Chapter 2, Project Description, Exhibit 2-2a, the development site and open space are roughly bounded by Dublin Canyon Road to the north; Devany Canyon and Creek and EBRPD land to the east and south; and agricultural lands to the west. The topography of the development site and open space is dominated by hills and knolls, sloping down to a canyon bordering the southeast boundary of the project site. The existing City limits follow the project site's northern and eastern boundary, while the City's Urban Growth Boundary (UGB) bisects the development site and open space from north to south, as shown in Exhibit 2-2a.

Additionally, the Oak Hills Congregational Church occupies an approximately 2.40-acre site to the north of the main portion of the development site (APN: 941-2700-001) (Church Site). The Church Site is not part of the proposed development but would be annexed into the City along with the development site to ensure a logical and orderly reorganization of the City boundaries.

Project Site

The 130.90-acre project site consists of five assessor's parcels, as listed in Table 3.10-1.

Table 3.10-1: Project Site Assessor's Parcel Numbers

Assessor's Parcel Numbers	Addresses	Ownership
941-2500-002	11033 Dublin Canyon Road	Lester family
941-2500-003	Dublin Canyon Road	Lester family
941-2600-002-06	Dublin Canyon Road	Unavailable
941-2700-002	10807 Dublin Canyon Road	Unavailable
941-2700-001	10971 Dublin Canyon Road	Unavailable

The project site consists of mostly undeveloped land, with the exception of two residential homes and related structures, both owned by the Lester family, located on two of the five project parcels (APNs 941-2500-002 and 941-2500-003), and the Oak Hills Congregational Church, located on APN 941-2700-001.

The most prevalent habitat on the project site is California annual grassland that has been used as rangeland for cattle grazing. Some seasonal wetlands occur in the northern portion of the site near Dublin Canyon Road. Extensive riparian woodland habitat associated with Devany Canyon and Creek and an unnamed tributary occur in the southern half of the project site. Elevations on the site range from 438 feet above mean sea level (AMSL) along Devany Creek to 774 feet AMSL in the proposed EBRPD Park. The project site has been used for cattle grazing in the past.

Surrounding Area

Surrounding land uses include a residential development of varying density to the north; public health and safety open space to the east and south; low density residential development further east; and undeveloped land to the west.

West

The project site is bounded by undeveloped land on the west. The undeveloped land consists mostly of grasslands, trees, and hilly terrain.

North

The project site is roughly bounded by Dublin Canyon Road on the north. Beyond Dublin Canyon Road are the Canyon Meadows and Canyon Creek residential developments, Interstate 580 (I-580), and undeveloped land and residential development north of I-580.

East

The project site is partially bounded by Devany Canyon and Creek, EBRPD lands, and residential development to the east. Large-lot rural residential units are also located to the east of the project site.

South

The project site is partially bounded by Devany Canyon and Creek and EBRPD lands to the south. Beyond Devany Canyon and Creek and the EBRPD lands is more undeveloped land which consists mostly of grasslands, trees, and hilly terrain.

Land Use Designations

City of Pleasanton

General Plan

The City General Plan is the policy document that guides the long-range development of land and the conservation of resources in Pleasanton and with which all other City ordinances and policies must be consistent.

The City adopted the current General Plan 2005–2025 in July 2009. The Housing Element Update was amended and adopted in 2023. The 2005–2025 General Plan designates the project site Low Density Residential (R-LD), Open Space–Agriculture and Grazing (OS-AG), and Open Space–Public Health and Safety (OS-PHS), as shown in Exhibit 2-3. The development site and open space is also included in the Housing Element Sites Overlay (HESO) and was identified as Site 1, Lester, in the Housing Element Update and associated EIR. The eastern portion of the project site is within the UGB.

Surrounding Land Uses

The project site is bordered by unincorporated Alameda County to the west, by the City of Pleasanton to the east, and by the City of Dublin on the north side of I-580, near the northern edge of the project site. This section describes the land use designations for surrounding properties. Exhibit 2-3 and Exhibit 2-4 show the land use designations and zoning for surrounding properties, as described below.

To the West

The surrounding area west of the project site is an unincorporated area of Alameda County designated OS-AG by the City's General Plan.

To the North

The surrounding area north of the project site is unincorporated Alameda County. Along the northeastern border of the site, land uses include A–Agriculture; PUD-MDR–Planned Unit Development–Medium Residential; PUD-HDR–Planned Unit Development–High Density Residential; and R-1-20–Single-family Residential.

To the East

The surrounding area east of the project site is designated OS-PHS, R-LD, and Residential–Rural Density (R-RD) by the City's General Plan.

To the South

The surrounding area south of the project site is designated Open Space–Parks and Recreation (OS-PR) by the City's General Plan.

3.10.3 - Regulatory Framework

Federal

Code of Federal Regulations Part 77

Title 14 of the Code of Federal Regulations Part 77, Safe, Efficient Use and Preservation of the Navigable Airspace, governs the Federal Aviation Administration (FAA) review of proposed construction exceeding certain height limits, defines airspace obstruction criteria, and provides for FAA aeronautical studies of proposed construction. The regulations contain three key elements: (1) standards for determining obstructions in the navigable airspace and designation of imaginary surfaces for airspace protection; (2) requirements for project sponsors to provide notice to the FAA of certain proposed construction or alteration of structures that may affect the navigable airspace; and (3) the initiation of aeronautical studies by the FAA to determine the potential effect(s), if any, of proposed construction or alterations of structures on the subject airspace. Pursuant to these federal regulations, any new structure or alterations to an existing structure (including portions of structures, mechanical equipment, flag poles, and other projections) with a height that would exceed Part 77 elevation thresholds is required to file a Notice of Proposed Construction or Alteration with the FAA. Part 77 Subpart C establishes obstruction standards for the airspace around airports including approach zones, conical zones, transitional zones, and horizontal zones known as "imaginary surfaces." These imaginary surfaces rise from the primary surface (ground level at the San Francisco International Airport [SFO] runways) and gradually rise along the approach slopes and sides of the runways. The FAA considers any objects that penetrate these imaginary surfaces as potential obstructions to air navigation. Obstructions may occur without compromising safe air navigation, but they must be marked, lighted, and noted on aeronautical publications to ensure that pilots can see and avoid them.

State

Housing Accountability Act

The Housing Accountability Act (Government Code § 65589.5) establishes substantial limitations on a local government's ability to deny, reduce the density of, or make infeasible housing development projects that are consistent with applicable, objective local development standards and contribute to meeting the regional housing need. The Housing Accountability Act acknowledges that the lack of housing is a critical problem that threatens the economic, environmental, and social quality of life in the State.

The Housing Accountability Act provides that when a proposed housing development complies with the applicable, objective general plan and zoning standards, but a local agency proposes to deny the project or approve it only if the density is reduced, the agency must base its decision on written findings supported by substantial evidence that:

1. The development would have a specific adverse impact on public health or safety unless, disapproved, or approved at a lower density; and
2. There is no feasible method to satisfactorily mitigate or avoid the specific adverse impact, other than the disapproval, or approval at a lower density. "Specific adverse impact" means a significant, quantifiable, direct, and unavoidable impact, based on objective, identified

> written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete.

The Housing Accountability Act also provides that a housing development project shall be deemed consistent, compliant, and in conformity with an applicable plan, program, policy, ordinance, standard, requirement, or other similar provision if there is substantial evidence that would allow a reasonable person to conclude that the housing development project is consistent, compliant, or in conformity.

Density Bonus Law

California's Density Bonus Law provides developers with a density bonus and other incentives for constructing lower income housing units within a development provided the developer meets certain requirements, as enumerated in Section 65915(b) of the Government Code:

> 65915 (b) A city, county, or city and county shall grant a density bonus and incentives or concessions described in subdivision (d) when the applicant for the housing development seeks and agrees to construct at least any one of the following:
> (1) Ten percent of the total units of a housing development for lower income households, as defined in Section 50079.5 of the Health and Safety Code.
> (2) Five percent of the total units of a housing development for very low income households, as defined in Section 50105 of the Health and Safety Code.
> (3) A senior citizen housing development as defined in Sections 51.3 and 51.12 of the Civil Code.
> (4) Ten percent of the total dwelling units in a condominium project as defined in subdivision (f) of, or in a planned development as defined in subdivision (k) of, Section 1351 of the Civil Code, for persons and families of moderate income, as defined in Section 50093 of the Health and Safety Code.

With respect to parking requirements, Section 65915.p(1) states:

> Upon the request of the developer no city, county, or city and county shall require a vehicular ratio, inclusive of handicapped and guest parking, of a development meeting the criteria of subdivision (b) that exceeds the following ratios:
>
> (A) Zero to one bedrooms: one on-site parking space
> (B) Two to three bedrooms: two on-site parking spaces

Local

City of Pleasanton

General Plan

The City of Pleasanton General Plan 2005–2025 (General Plan), adopted July 21, 2009, provides a blueprint for anticipated growth and the conservation of resources. The City's General Plan is the official document used by decision-makers and citizens to guide the community's long-range development of land and conservation of resources. The General Plan contains a land use map,

policies, and supporting information adequate for making informed decisions concerning the community's future.

The City's General Plan establishes the following goals, policies, and programs related to land use that are applicable to the project:

Conservation and Open Space Element

Goal 1 Promote sustainability to preserve and protect natural resources and open space.

Goal 5 Preserve and protect existing and proposed open space lands for public health and safety recreational opportunities, natural resources, sensitive viewsheds, and biological resources.

Policy 6 Protect all large continuous areas of open space, as designated on the General Plan Map, from intrusions by urban development.

Program 6.1 Explore working with the Tri-Valley Conservancy or similar entities to use transfer of development rights and conservation easements to preserve open space.

Program 6.3 Preserve large blocks of open space land by encouraging the clustering of development.

Program 6.4 Investigate methods and pursue opportunities to retain areas designated on the General Plan Map as Open Space for permanent open space use through acquisition, conservation easements, establishment of land trusts, etc.

Program 6.5 Encourage developers to publicly dedicate fee title to open space lands: (1) that are determined to have considerable public recreational, scenic, or natural resource value; (2) where operational costs can be met; and (3) where significant potential health or safety hazards do not exist. Developers should offer public access to the fullest extent possible.

Program 6.6 Develop zoning districts with open space uses appropriate for the adopted Open Space categories listed on the General Plan Map and that implement the policies and programs of the General Plan.

Land Use Element—Overall Community Development

Policy 4 Allow development consistent with the General Land Use Map.

Land Use Element—Residential

Policy 8 Preserve and Enhance the character of existing residential neighborhoods.

Policy 9 Develop new housing in infill and peripheral areas which are adjacent to existing residential development, near transportation hubs or local-serving commercial areas

Policy 10 Provide flexibility in residential development standards and housing type consistent with the desired community character.

Policy 11 Residential density is determined by the General Plan density range or applicable specific plan as outlined below: Residential projects proposed for land designated as Low- and Medium-Density Residential should propose densities generally consistent with the average densities assumed for buildout of the General Plan, as shown in Table 2-3 of the General Plan Land Use Element.

Land Use Element—Open Space

Policy 19 Preserve open space areas for the protection of public health and safety, the provision of recreational opportunities, use for agriculture and grazing, the production of natural resources, the preservation of wildlands, and the physical separation of Pleasanton from neighboring communities.

Program 19.1 Preserve open space by way of fee purchase, developer dedications, conservation and scenic easements, transfer of development rights, *Williamson Act* contracts, open space zoning categories, and other means which may become available.

Policy 21 Preserve scenic hillside and ridge views of the Pleasanton, Main, and Southeast Hills ridges.

City of Pleasanton Zoning Ordinance

The Pleasanton Zoning Ordinance, Chapter 18 of the City Municipal Code, has been enacted to provide a precise guide for the physical development of the City in such a manner as to achieve progressively the arrangement of land uses depicted in the General Plan adopted by the City Council. The ordinance also promotes the stability of existing land uses that conform with the General Plan and "to protect them from inharmonious influences and harmful intrusions."

The project site is currently zoned Unincorporated and prezoned Planned Unit Development–Low Density Residential, Agriculture, and Open Space–Housing Opportunity Zone (PUD-LDR/A/OS-HOZ) as shown in the Housing Element Update. These designations are discussed below.

- **PUD-LDR:** The Zoning Ordinance states that a Planned Unit Development (PUD) district is intended to encourage imagination and housing variety in the development of property of varying sizes and topography, avoiding the monotony of standard residential, commercial, and industrial developments. The PUD procedure ensures that the desires of the developer and the community are understood and approved prior to commencement of construction.
- **OS-PHS:** The General Plan states that an Open Space–Public Health and Safety (OS-PHS) district is land set aside for the protection of the public health and safety due to geologic, topographic, fire, or other hazards. No development is allowed in these areas other one single-family home on each existing lot.

- **A:** The Zoning Ordinance indicates that an Agricultural (A) district is permitted one-family dwelling unit and an accessory dwelling unit (ADU) or junior accessory dwelling unit per each site.
- **HOZ:** This zoning district is utilized for sites identified and contemplated within the Housing Element Update as Housing Element Opportunity sites.

Urban Growth Boundary (Measure FF)

In November 1996, the voters of the City of Pleasanton approved Measure FF, requiring voter approval for all but minor refinements to the City's UGB. Areas outside the UGB line are generally suitable for the long-term protection of natural resources, large-lot agriculture and grazing, parks and recreation, and similar uses. General Plan Land Use Element Policy 22 does not allow urban development beyond the UGB line.

City of Pleasanton Measures PP and QQ

In the November 2008 general election, the City of Pleasanton voters adopted two ballot measures regarding General Plan policy:[1]

1. Save Pleasanton's Hills and Housing Cap (Measure PP), a voter initiative; and
2. The Pleasanton Ridgelines Protection and Growth Control Initiative (Measure QQ), a City Council measure.

These two measures were incorporated into the City's 2005–2025 General Plan, adopted by the City Council on July 21, 2009. Measure PP limits the placement of housing units and structures on slopes of 25 percent or greater or within 100 vertical feet of a ridgeline and further limits grading on slopes of 25 percent or more or within 100 feet of a ridgeline to build residential or commercial structures. Measure PP exempts from these restrictions projects of 10 or fewer housing units on property that constitutes a single legal parcel as of January 1, 2007.

Measure QQ reaffirms and readopts policies in the then existing General Plan to (A) preserve scenic hillside and ridge views of specific ridges; (B) study the feasibility of preserving large open space areas in the Southeast Hills; and (C) protect large contiguous areas designated as Open Space in the General Plan.

With the adoption of Measure PP, its provisions are included in the City's General Plan as follows:

- **Land Use Element—Program 21.3:** Ridgelines and hillsides shall be protected. Housing units and structures shall not be placed on slopes of 25 percent or greater, or within 100 vertical feet of a ridgeline. No grading to construct residential or commercial structures shall occur on hillside slopes 25 percent or greater, or within 100 vertical feet of a ridgeline. Exempt from this policy are housing developments of 10 or fewer units on a single property. Splitting, dividing, or subdividing a "legal parcel" to approve more than 10 housing units is not allowed.

[1] As subsequent litigation determined that Pleasanton's earlier voter-adopted housing cap was in conflict with State law, those portions of Measures PP and QQ related to the housing cap are not discussed here.

With the adoption of Measure QQ, the re-adopted policies and program are set forth in the City's General Plan, as shown below.

- **Land Use Element—Policy 21:** Preserve scenic hillside and ridge views of the Pleasanton, Main and Southeast Hills ridges.
- **Land Use Element—Program 21.2:** Study the feasibility of preserving large open space areas in the Southeast Hills by a combination of private open space and a public park system.
- **Open Space Element—Policy 6:** Protect all large continuous areas of open space, as designated on the General Plan Map, from intrusion by urban development.

Pleasanton Municipal Code

The Pleasanton Municipal Code sets forth regulations to ensure that development and land use activities protect and promote the health, safety, comfort, convenience, prosperity, and general welfare of residents and businesses in the City. The Pleasanton Municipal Code consists of all ordinances adopted by the Pleasanton City Council.

3.10.4 - Methodology

Analysis in this section focuses on whether project implementation would physically divide an established community and whether the proposed project would conflict with land use plans, policies, or regulations adopted to avoid or mitigate an environmental effect. Conflicts or inconsistencies with a policy, in and of themselves, do not constitute significant environmental impacts for purposes of the California Environmental Quality Act (CEQA). Rather, it is only where (1) there is a conflict or inconsistency that (2) involves a policy that was adopted for the purpose of avoiding or mitigating an environmental effect, and (3) therefore a conflict with such a policy results in a significant environmental impact. Environmental impacts that would result from the proposed project in other environmental topic areas are discussed throughout Chapter 3 of this Draft EIR. The potential for land use impacts was assessed through review of applicable land use policy documents.

3.10.5 - Thresholds of Significance

The Lead Agency utilizes the criteria in CEQA Guidelines Appendix G Environmental Checklist to establish thresholds of significance to determine whether impacts to land use and planning are significant environmental effects. As such, the City has determined that the proposed project would have a potential impact if it would:

a) Physically divide an established community.
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

3.10.6 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the proposed project and provides mitigation measures where necessary.

Divide an Established Community

Impact LAND-1: The proposed project would not physically divide an established community.

Impact Analysis

Construction

Impacts related to physical division of an established community are limited to operational impacts. No respective construction impacts would occur.

Operation

The proposed project includes the construction of 28 new single-family residential units and roadways on 11.40 acres of the 128.50-acre development site and open space. The proposed project would include 117.1 acres of open space, including a permanent dedication of 69.30 acres to the EBRPD. The proposed project would also include the annexation of an approximately 2.40-acre parcel that contains the Oak Hills Congregational Church to the City.

The physical division of an established community would occur if the proposed project would involve construction of a large linear feature, such as a railroad or interstate highway, or if it would involve removal of access that would impact mobility within an existing community, such as removal of a bridge. The proposed project would involve the construction of three new internal roadways for circulation and connection from Dublin Canyon Road.

Proposed improvements to Dublin Canyon Road include the installation of bike lanes, a retaining wall, a crosswalk, and a traffic signal at the intersection of Canyon Meadows Drive. South of Devany Creek, a new driveway easement and open space access to EBRPD would be constructed, along with a parking area for passenger vehicles and horse trailers. Mobility within an existing community would not be impacted by the construction of the new internal roadways, improvements to Dublin Canyon Road, or the new open space access. The proposed project does not propose the construction of features that would impact mobility within an existing community or divide a community. Rather, the proposed project may increase connectivity and open space access. Impacts would be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

Conflict with Applicable Plans, Policies, or Regulations

Impact LAND-2: The proposed project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Impact Analysis

Development of the proposed project would result in a significant impact if it would conflict with applicable land use plans and policies of the General Plan that were adopted for the purpose of avoiding or mitigating an environmental effect. A policy inconsistency is considered a significant adverse impact only if the inconsistency would result in a significant adverse physical impact based on the established significance criterion. The consistency of the proposed project with applicable land use plans and policies is evaluated below.

Construction

Impacts related to consistency with applicable land use plans and policies are limited to operational impacts. No respective construction impacts would occur.

Operation

City of Pleasanton General Plan Consistency

The applicable General Plan policies pertain to the character of the project site and the City's general policy of protecting and preserving open space. As discussed below, the proposed project would include 117.1 acres of open space, including the permanent dedication of 69.3 acres to the EBRPD. The project site is outside of city limits but within the planning area boundary as defined in the General Plan.

The General Plan designates the project site as R-LD, OS-AG, and OS-PHS. The proposed project includes the development of 28 new single-family homes on approximately 11.40 acres and proposes a General Plan amendment to reflect R-LD and OS-AG, where appropriate (Exhibit 2-3).

The proposed General Plan amendments would be consistent with widely accepted planning principles of facilitating logical and orderly growth, ensuring compatibility with surrounding uses, and ensuring consistency with the goals and policies of the General Plan. When a project entails an amendment to the General Plan or zoning, inconsistency with the existing designation or zoning is an element of the project itself, which then necessitates a legislative policy decision by the agency and does not signify a potential environmental effect. As such, if approved, the proposed General Plan amendment would serve as a self-mitigating aspect of the proposed project that would serve to correct conflicts that would otherwise exist, and impacts would be less than significant.

Zoning

The proposed project would zone the development site and open space from unincorporated to PUD-LDR/A/OS-HOZ, consistent with the prezoning for the project site (Exhibit 2-4). The proposed project includes a design consistent with the proposed zoning changes and would be consistent with the zoning considered in the City's Housing Element Update.

Annexation

The proposed project would subdivide four parcels into 28 residential lots, with an additional two lots to replace two existing residence units located south of Devany Creek. The proposed project would also include the annexation of an approximately 2.40-acre parcel currently occupied by the Oak Hills Congregational Church to prevent the creation of an island following annexation of the development site and open space.

Compatibility with Surrounding Land Uses

The project site is surrounded by rural development and open space. The proposed project has been designed to be compatible with surrounding land uses. All home sites would be limited to the UGB portion of the project site, while the remaining portions of the development site and open space (117.1 acres) would remain as open space, with 69.30 acres dedicated as permanent EBRPD lands. As discussed in the Project Description, the project objectives include permanently preserving open space, maintaining the open space character at the edges of the City, and maintaining scenic hillside and ridge views, in accordance with the General Plan's Community Character element. See also Section 3.1, Aesthetics, which discusses the impacts of the project on the visual character and scenic resources of the area. By preserving significant acreage as open space, the proposed project would meet the General Plan goals and impacts would be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

3.10.7 - Cumulative Impacts

The geographic context for analysis of cumulative impacts related to land use and planning generally includes the City of Pleasanton. Land use decisions for both the proposed project and for the cumulative projects listed in Chapter 3, Environmental Impact Analysis, Table 3-1, as well as other relevant cumulative projects as required by CEQA, are made by the City. Development within the City is governed by the City's General Plan and various specific plans, as well as the City's Municipal Code. These ensure logical and orderly development and require discretionary review to ensure that projects do not result in land use impacts due to inconsistency with the General Plan and other regulations.

Other cumulative development projects in the City would be required to demonstrate consistency with applicable provisions of the City's General Plan and applicable codes, ordinances, and policies. This would ensure that these projects comply with applicable planning policies and regulations. The proposed project has been determined to be consistent with the General Plan's land use designations with the implementation of the proposed General Plan amendments, as described above. It has also been determined that the proposed project would not divide an established community. Given the above information, the proposed project, in conjunction with other existing, planned, and probable future projects, would result in less than significant cumulative impacts related to land use and planning.

Level of Cumulative Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

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3.11 - Noise

3.11.1 - Introduction

This section describes the existing noise setting and potential effects from project implementation on the site and its surrounding area. Descriptions and analysis in this section are based, in part, on noise modeling performed by FirstCarbon Solutions (FCS). The noise modeling output is included in this Draft Environmental Impact Report (Draft EIR) as Appendix G. No public comments were received during the EIR scoping period related to noise.

3.11.2 - Environmental Setting

Characteristics of Noise

Noise is generally defined as unwanted or objectionable sound. Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm or when it has adverse effects on health. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment. Noise effects can be caused by pitch or loudness. *Pitch* is the number of complete vibrations or cycles per second of a wave that result in the range of tone from high to low; higher-pitched sounds are louder to humans than lower-pitched sounds. *Loudness* is the intensity or amplitude of sound.

Sound is produced by the vibration of sound pressure waves in the air. Sound pressure levels are used to measure the intensity of sound and are described in terms of decibels. The decibel (dB) is a logarithmic unit, which expresses the ratio of the sound pressure level being measured to a standard reference level. The 0 point on the dB scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Changes of 3 dB or less are only perceptible in laboratory environments. Audible increases in noise levels generally refer to a change of 3 dB or more, as this level has been found to be barely perceptible to the human ear in outdoor environments. Only audible changes in existing ambient or background noise levels are considered potentially significant.

The human ear is not equally sensitive to all frequencies within the audible sound spectrum, so sound pressure level measurements can be weighted to better represent frequency-based sensitivity of average healthy human hearing. One such specific “filtering” of sound is called “A-weighting.” A-weighted decibels (dBA) approximate the subjective response of the human ear to a broad frequency noise source by discriminating against very low and very high frequencies of the audible spectrum. They are adjusted to reflect only those frequencies that are audible to the human ear. Because decibels are logarithmic units, they cannot be added or subtracted by ordinary arithmetic means. For example, if one noise source produces a noise level of 70 dB, the addition of another noise source with the same noise level would not produce 140 dB; rather, they would combine to produce a noise level of 73 dB.

Noise Descriptors

There are many ways to rate noise for various intervals, but an appropriate rating of ambient noise affecting humans also accounts for the annoying effects of sound. Equivalent continuous sound level (L_{eq}) is the total sound energy of time-varying noise over a sample period. However, the predominant

rating scales for human communities in the State of California are the L_{eq} and Community Noise Equivalent Level (CNEL) or the day-night average level (L_{dn}) based on dBA. CNEL is the time-varying noise over a 24-hour period, with a 5 dBA weighting factor applied to the hourly L_{eq} for noises occurring from 7:00 p.m. to 10:00 p.m. (defined as relaxation hours) and a 10 dBA weighting factor applied to noise occurring from 10:00 p.m. to 7:00 a.m. (defined as sleeping hours). L_{dn} is similar to the CNEL scale but without the adjustment for events occurring during the evening hours. CNEL and L_{dn} are within one dBA of each other and are normally exchangeable. The noise adjustments are added to the noise events occurring during the more sensitive hours.

Other noise rating scales of importance when assessing the annoyance factor include the maximum noise level (L_{max}), which is the highest exponential time-averaged sound level that occurs during a stated time period. The noise environments discussed in this analysis are specified in terms of maximum levels denoted by L_{max} for short-term noise impacts. L_{max} reflects peak operating conditions and addresses the annoying aspects of intermittent noise.

Noise Propagation

From the noise source to the receiver, noise changes both in level and frequency spectrum. The most obvious is the decrease in noise as the distance from the source increases. The manner in which noise reduces with distance depends on whether the source is a point or line source, as well as ground absorption, atmospheric conditions (wind, temperature gradients, and humidity) and refraction, and shielding by natural and manufactured features. Sound from a point source, such as an air conditioning condenser, a piece of construction equipment, or an idling truck, radiates uniformly outward as it travels away from the source in a spherical pattern.

The attenuation or sound drop-off rate is dependent on the conditions of the land between the noise source and receiver. To account for this ground-effect attenuation (absorption), two types of site conditions are commonly used in noise models: soft-site and hard-site conditions. Soft-site conditions account for the sound propagation loss over natural surfaces such as normal earth and ground vegetation. For point sources, a drop-off rate of 7.5 dBA per each doubling of the distance (dBA/DD) is typically observed over soft ground with landscaping, as compared with a 6 dBA/DD drop-off rate over hard ground such as asphalt, concrete, stone and very hard packed earth. For line sources, such as traffic noise on a roadway, a 4.5 dBA/DD is typically observed for soft-site conditions compared to the 3 dBA/DD drop-off rate for hard-site conditions. Table 3.11-1 briefly defines these measurement descriptors and other sound terminology used in this section.

Table 3.11-1: Sound Terminology

Term	Definition
Sound	A vibratory disturbance created by a vibrating object which, when transmitted by pressure waves through a medium such as air, can be detected by a receiving mechanism such as the human ear or a microphone.
Noise	Sound that is loud, unpleasant, unexpected, or otherwise undesirable.

Term	Definition
Ambient Noise	The composite of noise from all sources near and far in a given environment.
Decibel (dB)	A unitless measure of sound on a logarithmic scale, which represents the squared ratio of sound pressure amplitude to a reference sound pressure. The reference pressure is 20 micropascals, representing the threshold of human hearing (0 dB).
A-weighted Decibel (dBA)	An overall frequency-weighted sound level that approximates the frequency response of the human ear.
Equivalent Noise Level (L_{eq})	The average sound energy occurring over a specified time period. In effect, L_{eq} is the steady-state sound level that in a stated period would contain the same acoustical energy as the time-varying sound that actually occurs during the same period.
Maximum and Minimum Noise Levels (L_{max} and L_{min})	The maximum or minimum instantaneous sound level measured during a measurement period.
Day-Night Level (DNL or L_{dn})	The energy average of the A-weighted sound levels occurring during a 24-hour period, with 10 dB added to the A-weighted sound levels occurring between 10:00 p.m. and 7:00 a.m. (nighttime).
Community Noise Equivalent Level (CNEL)	The energy average of the A-weighted sound levels occurring during a 24-hour period, with 5 dB added to the A-weighted sound levels occurring between 7:00 p.m. and 10:00 p.m. and 10 dB added to the A-weighted sound levels occurring between 10:00 p.m. and 7:00 a.m. (nighttime).
Source: Data compiled by FirstCarbon Solutions (FCS). 2023.	

Traffic Noise

The level of traffic noise depends on the three primary factors: (1) the volume of the traffic, (2) the speed of the traffic, and (3) the number of trucks in the flow of traffic. Generally, the loudness of traffic noise is increased by heavier traffic volumes, higher speeds, and greater number of trucks. Vehicle noise is a combination of the noise produced by the engine, exhaust, and tires. Because of the logarithmic nature of noise levels, a doubling of the traffic volume (assuming that the speed and truck mix do not change) results in a noise level increase of 3 dBA. Based on the Federal Highway Administration (FHWA) community noise assessment criteria, this change is “barely perceptible”; for reference, a doubling of perceived noise levels would require an increase of approximately 10 dBA. The truck mix on a given roadway also has an effect on community noise levels. As the number of heavy trucks increases and becomes a larger percentage of the vehicle mix, adjacent noise levels increase.

Stationary Noise

A stationary noise producer is any entity in a fixed location that emits noise. Examples of stationary noise sources include machinery, engines, energy production, and other mechanical or powered equipment and activities such as loading and unloading or public assembly that may occur at commercial, industrial, manufacturing, or institutional facilities. Furthermore, while noise generated by the use of motor vehicles over public roads is preempted from local regulation, although the use of these vehicles is considered a stationary noise source when operated on private property such as at a construction site, a truck terminal, or warehousing facility. The emitted noise from the producer can be mitigated to acceptable levels either at the source or on the adjacent property through the use of proper planning, setbacks, block walls, acoustic-rated windows, and dense landscaping or by changing the location of the noise producer.

The effects of stationary noise depend on factors such as characteristics of the equipment and operations, distance and pathway between the generator and receptor, and weather. Stationary noise sources may be regulated at the point of manufacture (e.g., equipment or engines) with limitations on the hours of operation or with provision of intervening structures, barriers, or topography.

Construction activities are a common source of stationary noise. Construction-period noise levels are higher than background ambient noise levels but eventually cease once construction is complete. Construction is performed in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on each construction site and, therefore, would change the noise levels as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase. Table 3.11-2 shows typical noise levels of construction equipment as measured at a distance of 50 feet from the operating equipment.

Table 3.11-2: Typical Construction Equipment Maximum Noise Levels

Type of Equipment	Impact Device? (Yes/No)	Specification Maximum Sound Levels for Analysis (dBA at 50 feet)
Impact Pile Driver	Yes	95
Auger Drill Rig	No	85
Vibratory Pile Driver	No	95
Jackhammers	Yes	85
Pneumatic Tools	No	85
Pumps	No	77
Scrapers	No	85
Cranes	No	85
Portable Generators	No	82
Rollers	No	85
Bulldozers	No	85
Tractors	No	84

Type of Equipment	Impact Device? (Yes/No)	Specification Maximum Sound Levels for Analysis (dBA at 50 feet)
Front-end Loaders	No	80
Backhoe	No	80
Excavators	No	85
Graders	No	85
Air Compressors	No	80
Dump Truck	No	84
Concrete Mixer Truck	No	85
Pickup Truck	No	55

Notes:
dBA = A-weighted decibel
Source: Federal Highway Administration (FHWA). 2006. Highway Construction Noise Handbook. August.

Noise from Multiple Sources

Because sound pressure levels in decibels are based on a logarithmic scale, they cannot be added or subtracted in the usual arithmetical way. Sound pressure levels in decibels are logarithmically added on an energy summation basis. In other words, adding a new noise source to an existing noise source, both producing noise at the same level, will not double the noise level. Instead, if the difference between two noise sources is 10 dBA or more, the louder noise source will dominate, and the resultant noise level will be equal to the noise level of the louder source. In general, if the difference between two noise sources is 0–1 dBA, the resultant noise level will be 3 dBA higher than the louder noise source, or both sources if they are equal. If the difference between two noise sources is 2–3 dBA, the resultant noise level will be 2 dBA above the louder noise source. If the difference between two noise sources is 4–10 dBA, the resultant noise level will be 1 dBA higher than the louder noise source.

Characteristics of Vibration

Groundborne vibration consists of rapidly fluctuating motion through a solid medium, specifically the ground, which has an average motion of zero and in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. The effects of groundborne vibration typically only causes a nuisance to people, but in extreme cases, excessive groundborne vibration has the potential to cause structural damage to buildings. Although groundborne vibration can be felt outdoors, it is typically only an annoyance to people indoors where the associated effects of the shaking of a building can be notable. Groundborne noise is an effect of groundborne vibration and only exists indoors, since it is produced from noise radiated from the motion of the walls and floors of a room and may also consist of the rattling of windows or dishes on shelves.

Several different methods are used to quantify vibration amplitude such as the maximum instantaneous peak in the vibrations velocity, which is known as the peak particle velocity (PPV) or the root mean square (rms) amplitude of the vibration velocity. Because of the typically small amplitudes of vibrations, vibration velocity is often expressed in decibels—denoted as LV—and is

based on the reference quantity of 1 microinch per second. To distinguish vibration levels from noise levels, the unit is written as "VdB."

Although groundborne vibration can be felt outdoors, it is typically only an annoyance to people indoors where the associated effects of the shaking of a building can be notable. When assessing annoyance from groundborne vibration, vibration is typically expressed as rms velocity in units of decibels of 1 microinch per second, with the unit written in VdB. Typically, developed areas are continuously affected by vibration velocities of 50 VdB or lower. Human perception to vibration starts at levels as low as 67 VdB. Annoyance due to vibration in residential settings starts at approximately 70 VdB.

Off-site sources that may produce perceptible vibrations are usually caused by construction equipment, steel-wheeled trains, and traffic on rough roads, while smooth roads rarely produce perceptible groundborne noise or vibration. Construction activities, such as blasting, pile driving and operating heavy earthmoving equipment, are common sources of groundborne vibration. Construction vibration impacts on building structures are generally assessed in terms of PPV. Typical vibration source levels from construction equipment are shown in Table 3.11-3.[1]

Table 3.11-3: Vibration Levels of Construction Equipment

Construction Equipment	PPV at 25 Feet (inches/second)	rms Velocity in Decibels (VdB) at 25 Feet
Water Trucks	0.001	57
Scraper	0.002	58
Bulldozer (small)	0.003	58
Jackhammer	0.035	79
Concrete Mixer	0.046	81
Concrete Pump	0.046	81
Paver	0.046	81
Pickup Truck	0.046	81
Auger Drill Rig	0.051	82
Backhoe	0.051	82
Crane (mobile)	0.051	82
Excavator	0.051	82
Grader	0.051	82
Loader	0.051	82
Loaded Trucks	0.076	86
Bulldozer—Large	0.089	87
Caisson drilling	0.089	87
Vibratory Roller (small)	0.101	88

[1] Federal Highway Administration (FHWA). 2006. Highway Construction Noise Handbook. August.

Construction Equipment	PPV at 25 Feet (inches/second)	rms Velocity in Decibels (VdB) at 25 Feet
Compactor	0.138	90
Clam Shovel drop	0.202	94
Vibratory Roller (large)	0.210	94
Pile Driver (impact-typical)	0.644	104
Pile Driver (impact-upper range)	1.518	112

Notes:
PPV = peak particle velocity
rms = root mean square
VdB = velocity in decibels
Source: Compilation of scientific and academic literature generated by Federal Transit Administration (FTA) and Federal Highway Administration (FHWA).

The propagation of groundborne vibration is not as simple to model as airborne noise. This is because noise in the air travels through a relatively uniform medium, while groundborne vibrations travel through the earth, which may contain significant geological differences. Factors that influence groundborne vibration include:

- **Vibration source:** Type of activity or equipment, such as impact or mobile, and depth of vibration source;
- **Vibration path:** Soil type, rock layers, soil layering, depth to water table, and frost depth; and
- **Vibration receiver:** Foundation type, building construction, and acoustical absorption.

Among these factors that influence groundborne vibration, there are significant differences in the vibration characteristics when the source is underground compared to at ground surface. In addition, soil conditions are known to have a strong influence on the levels of groundborne vibration. Among the most important factors are the stiffness and internal damping of the soil and the depth to bedrock. Vibration propagation is more efficient in stiff clay soils than in loose sandy soils, and shallow rock seems to concentrate the vibration energy close to the surface and can result in groundborne vibration problems at large distance from the source. Factors such as layering of the soil and depth to the water table can have significant effects on the propagation of groundborne vibration. Soft, loose, sandy soils tend to attenuate more vibration energy than hard, rocky materials. Vibration propagation through groundwater is more efficient than through sandy soils. There are three main types of vibration propagation: surface, compression, and shear waves. Surface waves, or Rayleigh waves, travel along the ground's surface. These waves carry most of their energy along an expanding circular wave front, similar to ripples produced by throwing a rock into a pool of water. P-waves, or compression waves, are body waves that carry their energy along an expanding spherical wave front. The particle motion in these waves is longitudinal (i.e., in a "push-pull" fashion). P-waves are analogous to airborne sound waves. S-waves, or shear waves, are also body waves that carry energy along an expanding spherical wave front. However, unlike P-waves, the particle motion is transverse, or side-to-side and perpendicular to the direction of propagation.

As vibration waves propagate from a source, the vibration energy decreases in a logarithmic nature and the vibration levels typically decrease by 6 VdB per doubling of the distance from the vibration source. As stated above, this drop-off rate can vary greatly depending on the soil type, but it has been shown to be effective enough for screening purposes, in order to identify potential vibration impacts that may need to be studied through actual field tests. The vibration level (calculated below as "PPV") at a distance from a point source can generally be calculated using the vibration reference equation:

$$PPV = PPV_{ref} * (25/D)^n \text{ (in/sec)}$$

Where:

PPV_{ref} = reference measurement at 25 feet from vibration source
D = distance from equipment to the receptor
n = vibration attenuation rate through ground

According to Chapter 12 of the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual, an "n" value of 1.5 is recommended to calculate vibration propagation through typical soil conditions.[2]

Existing Noise Environment

The project site is surrounded by Dublin Canyon Road to the north, Devany Canyon and Creek and East Bay Regional Park District (EBRPD) land to the east and south, and agricultural lands to the west. The dominant noise source in the project vicinity is traffic on Dublin Canyon Road, which runs along the northeastern boundary of the project site. An ambient noise monitoring effort was conducted to document ambient noise levels on the project site.

One long-term noise measurement was also taken approximately 40-feet south of Dublin Canyon Road, approximately 10-feet east of the driveway to the Kingdom Hall of Jehovah's Witnesses property. The primary noise source observed during the measurement was traffic on Dublin Canyon Road. The measurement was taken from 3:50 p.m. on October 24, 2024, to 4:35 p.m. on October 25, 2024. The noise measurement results showed that the 24-hour weighted average noise level was 66.7 dBA L_{dn}, with a daytime average noise level of 67.3 dBA L_{eq} and a nighttime average of 55.4 dBA L_{eq}.

3.11.3 - Regulatory Framework

Federal

Noise Control Act

The adverse impact of noise was officially recognized by the federal government in the Noise Control Act of 1972, which serves three purposes:

- Promulgating noise emission standards for interstate commerce
- Assisting state and local abatement efforts
- Promoting noise education and research

[2] Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. September.

The federal Office of Noise Abatement and Control (ONAC) was initially tasked with implementing the Noise Control Act. However, the ONAC has since been eliminated, leaving the development of federal noise policies and programs to other federal agencies and interagency committees.

Among the agencies now regulating noise are the Occupational Safety and Health Administration (OSHA), which limits noise exposure of workers to 90 dB L_{eq} or less for 8 continuous hours or 105 dB L_{eq} or less for 1 continuous hour; the United States Department of Transportation (USDOT), which assumed a significant role in noise control through its various operating agencies; and the Federal Aviation Administration (FAA), which regulates noise of aircraft and airports. Surface transportation system noise is regulated by a host of agencies, including the FTA. Transit noise is regulated by the federal Urban Mass Transit Administration, while freeways that are part of the interstate highway system are regulated by the FHWA. Finally, the federal government actively advocates that local jurisdictions use their land use regulatory authority to arrange new development in such a way that "noise-sensitive" uses are either prohibited from being sited adjacent to a highway, or alternatively, that developments are planned and constructed in such a manner that minimize potential noise impacts.

Since the federal government has preempted the setting of standards for noise levels that can be emitted by transportation sources, local jurisdictions are limited to regulating the noise generated by the transportation system through nuisance abatement ordinances and land use planning.

Federal Transit Administration Standards and Guidelines

FTA has established industry-accepted standards for vibration impact criteria and impact assessment. These guidelines are published in its Transit Noise and Vibration Impact Assessment Manual.[3] The FTA guidelines include thresholds for construction vibration impacts for various structural categories as shown in Table 3.11-4.

Table 3.11-4: Federal Transit Administration Construction Vibration Impact Criteria

Building Category	PPV (in/sec)	Approximate VdB
I. Reinforced Concrete, Steel or Timber (no plaster)	0.5	102
II. Engineered Concrete and Masonry (no plaster)	0.3	98
III. Nonengineered Timber and Masonry Buildings	0.2	94
IV. Buildings Extremely Susceptible to Vibration Damage	0.12	90

Notes:
PPV = peak particle velocity
VdB = velocity in decibels
Source: Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment. September.

State

California General Plan Guidelines

Established in 1973, the California Department of Health Services Office of Noise Control was instrumental in developing regularity tools to control and abate noise for use by local agencies. One

[3] Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. September.

significant model is the Land Use Compatibility for Community Noise Environments Matrix, which allows the local jurisdiction to delineate compatibility of sensitive uses with various incremental levels of noise.[4]

Government Code Section 65302 mandates that the legislative body of each county and city in California adopt a noise element as part of its comprehensive general plan. The local noise element must recognize the land use compatibility guidelines published by the State Department of Health Services. The guidelines rank noise/land use compatibility in terms of normally acceptable, conditionally acceptable, normally unacceptable, and clearly unacceptable. The project is also subject to review under the State of California Environmental Quality Act (CEQA). Appendix G of the CEQA Guidelines provides impact thresholds for potential noise and vibration impacts. The City of Pleasanton has developed its own CEQA thresholds, which are listed in the Thresholds of Significance section below.

California Building Standards Code

The State of California has established noise insulation standards for new hotels, motels, apartment houses, and dwellings (other than single-family detached housing). These requirements are provided in the 2016 California Building Standards Code (CBC) (California Code of Regulations [CCR] Title 24).[5] As provided in the CBC, the noise insulation standards set forth an interior standard of 45 dBA CNEL as measured from within the structure's interior. When such structures are located within a 65 dBA CNEL (or greater) exterior noise contour associated with a traffic noise along a roadway, an acoustical analysis is required to ensure that interior levels do not exceed the 45 dBA CNEL threshold.

Title 24 standards are typically enforced by local jurisdictions through the building permit application process.

Assembly Bill No. 1307

Assembly Bill No. 1307 went into effect January 1, 2024. This bill clarifies that "for residential projects, the effects of noise generated by project occupants and their guests on human beings is not a significant effect on the environment."[6] Therefore, this analysis does not address potential noise impacts from future occupants and their guests on sensitive receptors in the project vicinity.

Local

City of Pleasanton General Plan

The City amended the General Plan Noise Element in 2013. The City's established noise and land use compatibility guidelines are shown in Table 3.11.

[4] California Department of Health Services Office of Noise Control. 1976. Land Use Compatibility for Community Noise Environments Matrix.
[5] California Building Standards Commission. 2017. California Building Standards Code (CCR Title 24), January 1.
[6] California Legislative Information. Assembly Bill No. 1307. Website: https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202320240AB1307. Accessed September 30, 2024.

Table 3.11-5 Noise and Land Use Compatibility Guidelines

Land Use Category	Exterior Noise Exposure (L_{dn}), dB					
	55	60	65[2]	70	75	80
Single-Family Residential[1]						
Multi-Family Residential, Hotels, and Motels[1]						
Outdoor Sports and Recreation, Neighborhood Parks and Playgrounds						
Schools, Libraries, Museums, Hospitals, Personal Care, Meeting Halls, Churches						
Office Buildings, Business, Commercial, and Professional						
Auditoriums, Concert Halls, Amphitheaters						

	Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special insulation requirements.
	Conditionally Acceptable: Specified land use may be permitted only after detailed analysis of the noise reduction requirements and needed noise insulation features included in the design.
	Unacceptable: New construction or development should generally not be undertaken because mitigation is usually not feasible to comply with noise element policies.

Notes:
dBA = A-weighted decibel
L_{dn} = day/night average sound level
[1] In noise environments resulting primarily from railroad trains, exterior noise levels up to 70 dBA Ldn are normally acceptable recognizing that day-night average noise levels are controlled by intermittent, loud events.
[2] <65 dBA outdoors = <45 dBA indoors
Source: City of Pleasanton. 2005. Pleasanton Plan 2025. Noise Element. Table 11-5.

The Noise Element also sets forth the following policies to protect the health and welfare of the community that are directly applicable to the Housing Element Update.[7]

Goal 1 Reduce noise to acceptable levels throughout the community.

Policy 1 Require new projects to meet acceptable exterior noise level standards.

Program 1.1 Use the normally acceptable designation and text description contained in Table 11-5 "Noise and Land- Use Compatibility Guidelines," to determine the acceptability of new development and to determine when noise studies are required. For new single-family residential development, maintain a maximum day/night average noise level standard of 60 dBA L_{dn} for exterior noise in private or shared outdoor use areas excluding front yards. For new multi-family residential development, maintain a maximum standard of 65 dBA L_{dn} in community outdoor recreation areas (or 60 dBA L_{dn} when the outdoor noise is due to aircraft). Noise standards are not applied to balconies or front yards. In the Downtown, the City Council will evaluate the requirement to achieve these standards on a case-by-case basis.

Program 1.2 Where high noise levels are the result of railroad trains, an exterior noise level of up to 70 dBA L_{dn} would be considered compatible with most residential development recognizing that day-night average noise levels are controlled by intermittent, loud events. Vibration-sensitive land uses located near the Union Pacific Railroad tracks should demonstrate compatibility with the Federal Transit Administration's vibration impact criteria by completing site-specific vibration analyses.

Program 1.3 Use noise guidelines and contours to determine the need for noise studies and require new developments to construct or pay for noise attenuation features as a condition of approving new projects. An exterior increase of more than 4 decibels is considered significant.

Policy 3 Ensure that noise does not exceed interior noise levels of 45 dBA L_{dn} for residential uses and those levels specified in noise studies for other uses.

Program 3.2 Require noise attenuation measures when necessary to ensure that interior noise levels for new single- and multi-family residences do not exceed 45 dBA L_{dn}. Interior noise levels shall not exceed 45 dBA L_{dn} in any new residential units (single and multi-family). Development sites exposed to noise levels exceeding 60 dBA L_{dn} shall be analyzed following protocols in Appendix Chapter 12, Section 1208, A, Sound Transmission Control, 2001 (current) California Building Code, Section 1207.

Program 3.3 New residential development affected by noise from railroad trains and aircraft shall be designed to limit typical maximum instantaneous noise levels to 50 dBA in bedrooms and 55 dBA in other rooms.

[7] City of Pleasanton General Plan. 2013. Noise Element. Website: https://www.cityofpleasantonca.gov/gov/depts/cd/planning/general.asp. Accessed April 22, 2022.

Program 3.4 Appropriate interior noise levels in commercial, industrial, and office buildings are a function of the use of the space. Interior noise levels in noise-sensitive spaces (e.g., offices) generally should be maintained at 45 dBA L_{eq} or less (hourly average).

Policy 4 Control noise at its source to maintain existing noise levels, and in no case to exceed acceptable noise levels as established in the Noise and Land Use Compatibility Guidelines, Table 11-5 (Table 3.11 in this Program EIR, above).

Program 4.3 Aggressively enforce the noise emissions standards for all vehicles. Enforce Section 27007 of the California Motor Vehicle Code. This section prohibits amplified sound which can be heard 50 or more feet from a vehicle. Control excessive exhaust noise by enforcing Section 27150 of the *California Motor Vehicle Code*.

Program 4.6 Require developers of new projects that would significantly increase noise in nearby homes to mitigate noise impacts with walls, berms or other measures, and/or to provide noise-attenuating measures in the homes.

Policy 5 Protect schools, hospitals, libraries, religious facilities, convalescent homes, and other noise-sensitive uses from noise levels exceeding those allowed in residential areas.

Program 5.1 Locate new noise-sensitive land uses away from noise sources unless development plans include appropriate mitigation measures.

Program 5.2 Locate new noise sources away from noise-sensitive land uses unless development plans include appropriate mitigation measures.

Policy 6 Limit truck traffic in residential and commercial areas to designated truck routes, as consistent with State law.

Program 6.1 Limit construction, delivery, and through-truck traffic to designated routes.

Program 6.2 Enforce the use of truck routes.

Policy 7 Design City streets to reduce noise levels in adjacent areas.

Program 7.1 As appropriate, require sound-attenuating paving on streets, earth berms, setbacks, sound walls, and/or other noise reduction techniques as conditions of development approval. Developers should use sound walls only where other techniques are not feasible. Where sound walls are needed, design and high-quality materials, as well as landscaping, should be used to mitigate their visual impact.

Program 7.2 Attempt to maintain collector streets at 6,000-10,000 or fewer Average Daily Traffic (ADT) to ensure acceptable noise levels within adjacent residences.

The City of Pleasanton Municipal Code

The City has established operational noise performance standards for residential properties in Section 9.04.030 of the Municipal Code which prohibit noise levels in excess of 60 dBA at any point outside the property plan unless otherwise provided in the Municipal Code. For example, Section 9.04.070 provides a daytime exception that any noise which does not produce a noise level exceeding 70 dBA at a distance of 25 feet under its most noisy condition of use shall be exempt from the provisions of Sections 9.04.030 between the hours of 8:00 a.m. and 8:00 p.m. daily, except Sundays and holidays, when the exemption shall apply between 10:00 a.m. and 6:00 p.m.

Section 9.04.100 establishes the City's restrictions on construction noise. Construction noise is exempt from the noise performance standards of the Noise Ordinance between the hours of 8:00 a.m. and 8:00 p.m. daily, except Sunday and holidays, when the exemption shall apply between 10:00 a.m. and 6:00 p.m., provided the construction activity meets at least one of the following noise limitations:

A. No individual piece of equipment shall produce a noise level exceeding 83 dBA at a distance of 25 feet. If the device is housed within a structure on the property, the measurement shall be made outside the structure at a distance as close to 25 feet from the equipment as possible; or

B. The noise level at any point outside of the property plane of the project shall not exceed 86 dBA.

According to Section 9.04.110, an exception permit may be granted to allow exemption from noise performance standards of the Noise Ordinance. Such a permit shall be of as short duration as possible (up to a 6 months), but is renewable upon a showing of good cause, and shall be conditioned by a schedule and details of methods for compliance in appropriate cases.

3.11.4 - Methodology

Construction Noise Analysis Methodology

A worst-case scenario was analyzed assuming each piece of modeled equipment would operate simultaneously at the nearest reasonable locations to the closest noise-sensitive receptor for the loudest phase of construction. Noise emission levels recommended by FHWA's Highway Construction Noise Handbook were used to ascertain the noise generated by specific types of construction equipment. The calculation spreadsheet with the detailed modeling assumptions is provided in the noise report included in Appendix G.

Traffic Noise Modeling Methodology

For the purposes of this analysis, traffic noise levels along selected roadway segments in the project vicinity would have a significant impact if a project would cause existing traffic noise levels to increase by 4 dBA L_{dn} or more. Typically, a doubling of the Average Daily Traffic (ADT) hourly volumes on a roadway segment is required in order to result in an increase of 3 dBA in traffic noise levels.

Therefore, for the purposes of this analysis, a doubling of the existing ADT volumes would result in a substantial permanent increase in traffic noise levels.

Stationary Noise Source Analysis Methodology

The proposed project would generate noise from new stationary sources, including mechanical equipment operations and parking lot activity. To provide a conservative analysis, reasonable worst-case hourly average noise levels for each noise source, and also for the combined noise sources, were calculated as measured at the nearest sensitive receptor. The analysis considered industry-standard reference noise levels from the proposed activities and used the highest end of the range of reference noise levels for these stationary noise sources. The calculated noise considered the distance to the nearest sensitive receptor land uses. The calculation spreadsheet with the detailed modeling assumptions is provided in the noise report included in Appendix G.

Vibration Impact Analysis Methodology

The City does not have adopted criteria for construction or operational groundborne vibration impacts. Therefore, the FTA's vibration impact criteria and modeling and analysis methodology were utilized to evaluate potential vibration impacts. The FTA has established industry-accepted standards for vibration impact criteria and impact assessment, which are summarized in Table 3.11-5 above. A reasonable worst-case scenario was analyzed assuming the piece of equipment that would generate the highest groundborne vibration levels would operate at the nearest reasonable location to an off-site structure. FTA and FHWA reference vibration levels for construction equipment, as summarized in Table 3.11-3, were used to calculate reasonable worst-case construction vibration levels.

Cumulative Analysis Methodology

The geographic scope of the cumulative noise analysis is limited by the range of potential noise impacts. Noise impacts tend to be localized; therefore, noise impacts for construction, mobile, and stationary noise sources are limited to approximately 500 feet from the source. Noise impacts for airport-related noise sources are limited to the areas within an airport's 65 dBA CNEL noise contours.

Groundborne vibration impacts are also very localized. Therefore, potential cumulative impacts from groundborne vibration would be limited to 50-feet from the type of single event activity (such as temporary construction) that could occur with implementation of the proposed project. In addition, the only cumulatively considerable contribution to permanent or ongoing operational groundborne vibration conditions in the project vicinity would result from introduction of new permanent sources of groundborne vibration to an existing impacted environment.

The cumulative impact analysis evaluates whether the impacts of the proposed project, together with the impacts of cumulative development, could result in a cumulatively significant impact with respect to noise. The analysis also considers whether incremental contribution of impacts associated with the implementation of the proposed project would be significant. Both conditions must apply for a project's cumulative effects to rise to the level of a significant impact. If there is no impact associated with respect to a particular CEQA threshold, discussion of cumulative impacts is not required. Accordingly, cumulative discussion is limited to the potential impacts as discussed below.

3.11.5 - Thresholds of Significance

The Lead Agency utilizes the criteria in the CEQA Guidelines Appendix G Environmental Checklist to establish thresholds of significance to determine whether impacts to noise are significant environmental effects. As such, the City has determined that the proposed project would have a potential impact if it would:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

b) Generation of excessive groundborne vibration or groundborne noise levels.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels.

3.11.6 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the development of the proposed project and provides mitigation measures where appropriate.

Substantial Noise Increase in Excess of Standards

Impact NOI-1:	**The project would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.**

Impact Analysis

Construction Noise

A significant impact would occur if construction noise levels at the project site would exceed the standards established by the Pleasanton Municipal Code Section 9.04.100. According to Section 9.04.100, noise producing construction activities shall not be permitted on Sundays or on holidays unless authorized by a valid City permit. Furthermore, the City's criteria for construction noise establishes that construction noise is exempt from the noise performance standards of the Noise Ordinance between the hours of 8:00 a.m. and 8:00 p.m. daily, except Sunday and holidays, when the exemption shall apply between 10:00 a.m. and 6:00 p.m., provided the construction activities meet at least one of the following noise limitations: no individual piece of equipment shall produce a noise level exceeding 83 dBA at a distance of 25 feet, or the noise level at any point outside of the property plane of the project site shall not exceed 86 dBA.

The City does not define what would be a significant increase for mobile source equipment noise levels. According to the California Department of Transportation (Caltrans) Traffic Noise Analysis Protocol,[8] in California a substantial noise increase is considered to occur when a project's combined

[8] California Department of Transportation (Caltrans). 2020. Traffic Noise Analysis Protocol.

mobile source equipment noise levels exceed the existing noise level by 12 dBA or more. Therefore, for purposes of this analysis, an increase of 12 dBA or greater above existing noise levels would be a substantial increase in construction noise levels.

Construction is completed in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on the site and, therefore, the noise levels surrounding the site as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase. The loudest phase of construction would be the site preparation and grading phase, as that is when the loudest pieces of heavy construction equipment would operate on-site. For example, the maximum noise level generated by each scraper is assumed to be 85 dBA L_{max} at 50 feet from this equipment. Each bulldozer would also generate 85 dBA L_{max} at 50 feet. The maximum noise level generated by graders is approximately 85 dBA L_{max} at 50 feet. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full-power operation followed by 3 or 4 minutes at lower power settings. Impact equipment, such as impact pile drivers, are not planned to be used during construction of this proposed project.

A conservative but reasonable assumption is that this equipment would operate simultaneously and continuously over at least a 1-hour period in the vicinity of the closest existing residential receptors but would move linearly over the project site as they perform their earthmoving operations, spending a relatively short amount of time adjacent to any one receptor. A characteristic of sound is that each doubling of sound sources with equal strength increases a sound level by 3 dBA. Assuming that each piece of construction equipment operates at some distance from the other equipment, a reasonable worst-case combined noise level during this phase of construction would be 90 dBA L_{max} at a distance of 50 feet from the acoustic center of a construction area. The acoustical center reference is used because construction equipment must operate at some distance from one another on a project site, and the combined noise level as measured at a point equidistant from the sources (acoustic center) would be the worst-case maximum noise level. These operations would be expected to result in a reasonable worst-case hourly average of 86 dBA L_{eq} at a distance of 50 feet from the acoustic center of a construction area. These worst-case construction noise levels would only occur during the site preparation phase of development.

The closest noise-sensitive receptors to the construction footprint where heavy construction equipment would operate are single-family residences located north of the project site, across Dublin Canyon Road. The closest receiving residential property would be located over 100 feet from the acoustic center of construction activity where multiple pieces of heavy construction equipment would potentially operate at the project site. At this distance, reasonable worst-case construction noise levels could range up to approximately 74 dBA L_{eq} at the nearest receiving residential property line. These reasonable worst-case construction noise levels at any single receptor would reduce by 6 dBA/DD as heavy construction equipment moves across the project site. The noise calculation sheet is provided in Appendix G.

These reasonable worst-case calculated construction noise levels would not exceed the City's applicable construction noise threshold of 86 dBA as measured at the nearest receiving property

line. In addition, the City has a code enforcement system that would handle construction noise complaints. Enforcement of the restricted hours of construction would preclude potential construction noise impacts during nighttime hours. Therefore, the proposed project would not result in a substantial temporary increase in ambient noise levels at off-site sensitive receptors above established standards, and construction noise impacts on sensitive receptors in the project vicinity would be less than significant.

Operational Noise

Mobile Source Noise

A significant impact would occur if project-generated traffic would result in a substantial increase in ambient noise levels compared with those that would exist without the proposed project. The General Plan states that "an exterior increase of more than 4 decibels is considered significant."

Typically, a doubling of the ADT hourly volumes on a roadway segment is required in order to result in an increase of 3 dBA in traffic noise levels, which, as discussed in the characteristics of noise discussion above, is the lowest change that can be perceptible to the human ear in outdoor environments. Therefore, for the purposes of this analysis, a doubling of the existing ADT volumes would result in a substantial permanent increase in traffic noise levels.

The existing trips on Dublin Canyon Road were documented by the traffic analysis prepared for the proposed project, as shown in Section 3-14, Transportation, to be 800 AM and 1,000 PM peak-hour weekday trips.

Based on the project trip generation data prepared for the proposed project, as shown in Section 3-14, Transportation, to be 407 average daily trips, with 22 weekday AM peak-hour trips and 56 weekday PM peak-hour trips. These project trips would not double average daily or peak-hour traffic volumes and would result in a less than 1 dBA increase in traffic noise levels, which is well below the 4 dBA increase that would be considered significant. Therefore, the proposed project's impact on traffic noise levels would be less than significant.

Stationary Source Noise

A significant impact would occur if operational noise levels generated by stationary noise sources at the project site would result in a substantial permanent increase in ambient noise levels more than any of the noise performance thresholds established by the City. The City has established operational noise performance standards for residential properties in Section 9.04.030 of the Municipal Code, which prohibits noise levels in excess of 60 dBA at any point outside the property plan, unless otherwise provided in the Municipal Code. For example, Section 9.04.070 provides a daytime exception that any noise which does not produce a noise level exceeding 70 dBA at a distance of 25 feet under its most noisy condition of use shall be exempt from the provisions of Sections 9.04.030 between the hours of 8:00 a.m. and 8:00 p.m. daily, except Sundays and holidays, when the exemption shall apply between 10:00 a.m. and 6:00 p.m.

The primary new stationary noise source associated with implementation of the proposed project would be the new mechanical ventilation system operations associated with the proposed residential uses. Potential impacts associated with this new noise source are analyzed below.

Mechanical Equipment Operations

Noise levels from typical market available residential mechanical ventilation equipment range from 50 dBA to 70 dBA L_{eq} at a distance of approximately 3 feet. Proposed mechanical ventilation systems for the proposed commercial land uses could be located approximately 160 feet from the nearest receiving residential property line—the residential land uses north of the project site. At this distance, noise generated by proposed mechanical ventilation equipment would attenuate to below 18 dBA L_{eq} at the receiving residential property line. The calculation spreadsheet with detailed modeling assumptions is provided in the noise report included in Appendix G.

These operational noise levels would not exceed the City's noise performance thresholds of 60 dBA threshold at the nearest receiving residential property line. In addition, these calculated mechanical equipment operational noise levels would not exceed documented existing ambient noise levels documented in the project vicinity.

Therefore, proposed mechanical ventilation system operational noise levels would not result in a substantial permanent increase in noise levels in excess of established standards. The impact of mechanical ventilation equipment operational noise levels on sensitive off-site receptors would be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

Groundborne Vibration/Noise Levels

Impact NOI-2:	**The project would not result in generation of excessive groundborne vibration or groundborne noise levels.**

Impact Analysis

This section analyzes both construction and operational groundborne vibration and noise impacts. Groundborne vibrations consist of rapidly fluctuating motions within the ground that have an average motion of zero. Vibrating objects in contact with the ground radiate vibration waves through various soil and rock strata to the foundations of nearby buildings. Groundborne noise is generated when vibrating building components radiate sound, or noise, generated by groundborne vibration. In general, if groundborne vibration levels do not exceed levels considered to be perceptible, then groundborne noise levels would not be perceptible in most interior environments. Therefore, this analysis focuses on determining exceedances of groundborne vibration levels.

Construction Vibration Impacts

A significant impact would occur if existing structures at the project site or in the project vicinity would be exposed to groundborne vibration levels in excess of levels established by the FTA's Construction Vibration Impact Criteria, as summarized in Table 3.11-4.

Of the variety of equipment used during construction, the small vibratory rollers anticipated to be used in the site preparation phase of construction would produce the greatest groundborne vibration levels. Small vibratory rollers produce groundborne vibration levels ranging up to 0.101 inch per second (in/sec) PPV at 25 feet from the operating equipment.

The nearest off-site structure is a residential home located north of the project site, approximately 150 feet from the nearest construction footprint where small vibratory rollers would potentially operate. At this distance, groundborne vibration levels would attenuate to below 0.007 in/sec PPV from operation of a small vibratory roller. This is well below the FTA's Construction Vibration Impact Criteria of 0.2 in/sec PPV for this type of structure, which is a building of nonengineered timber and masonry construction. Therefore, the impact of short-term groundborne vibration associated with construction to off-site receptors would be less than significant.

Operational Vibration Impacts

A significant impact would occur if the proposed project would generate excessive groundborne vibration or groundborne noise levels. Implementation of the proposed project would not include any permanent sources that would expose persons in the project vicinity to groundborne vibration levels that could be noticeable without instruments at the lot line of the project site. In addition, there are no existing significant permanent sources of groundborne vibration in the project vicinity. Therefore, project operations would not generate excessive groundborne vibration levels or expose proposed uses to excessive groundborne vibration levels, and groundborne vibration impacts would be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

Excessive Noise Levels from Airport Activity

Impact NOI-3:	**The project would not expose people residing or working in the project area to excessive noise levels for a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport.**

Impact Analysis

A significant impact would occur if the proposed project would expose people residing or working in the project area to excessive noise levels for a project located within the vicinity of a private airstrip or an Airport Land Use Compatibility Plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport.

The nearest airport to the project site is the Livermore Municipal Airport located 6.43 miles east of the project site. Because of the distance from and orientation of the airport runways, the project site is located well outside of the 65 dBA CNEL airport noise contours. While aircraft noise is occasionally audible on the project site from aircraft flyovers, aircraft noise associated with nearby airport activity

would not expose people residing or working near the project site to excessive noise levels. Therefore, implementation of the proposed project would not expose persons residing or working in the project vicinity to noise levels from airport activity that would be in excess of normally acceptable standards for residential land use development, and there would be no project impact associated with airport noise.

Level of Significance Before Mitigation

No impact.

Mitigation Measures

None.

3.11.7 - Cumulative Impacts

Cumulative Analysis

Construction Noise

The geographic scope of the cumulative noise analysis is limited by the range of potential noise impacts. Noise impacts tend to be localized; therefore, noise impacts for construction-related noise sources are limited to approximately 500 feet from the source. No cumulative projects are located within 500 feet of the project site that would contribute to a cumulative construction noise impact with the project. Therefore, cumulative impacts are less than significant. Accordingly, the proposed project would not result in a potentially significant cumulatively considerable contribution to temporary construction noise levels in the project vicinity. This impact would be less than significant.

Operational Traffic Noise Impacts

The geographic scope of the cumulative noise analysis is limited by the range of potential noise impacts. Project traffic noise impacts are limited to roadway segments in the project vicinity that would carry a majority of project trips. The significance threshold for a cumulative traffic noise impact would be a substantial permanent increase in traffic noise levels in the vicinity of the project site along any roadway segment that already experiences noise levels in excess of the City's noise and land use compatibility normally or conditionally acceptable standards for adjacent land uses.

Based on the existing ambient noise monitoring effort, the documented existing ambient noise levels on the project site adjacent to Dublin Canyon Road average 66.7 dBA L_{dn}, as measured at approximately 40 feet from the edge of the roadway. These noise levels are considered conditionally acceptable according to the City's noise and land use compatibility guidelines for residential land uses and do not constitute a cumulative noise impact. As shown in the analysis above, the proposed project's trips would result in a less than 1 dBA increase in traffic noise levels along any roadway segment in the project vicinity. This increase is below a level that would be a perceptible increase and well below a level that would be considered a substantial increase in traffic noise levels. In addition, even a full 1 dBA increase in traffic noise levels, up to 67.7 dBA L_{dn}, would still be considered conditionally acceptable according to the City's noise and land use compatibility guidelines. Therefore, implementation of the proposed project would not result in a cumulatively

considerable contribution to the less than significant cumulative traffic noise impacts in the project vicinity. This impact would be less than significant.

Operational Stationary Noise Impacts

The geographic scope of the cumulative noise analysis is limited by the range of potential noise impacts. Noise impacts tend to be localized; therefore, noise impacts for stationary noise sources are limited to approximately 500 feet from the source. Past and present projects within 500 feet are considered in the existing ambient conditions for the proposed project. There are no anticipated future cumulative projects within 500 feet.

The significance threshold for a cumulative stationary source operational noise impact would be a substantial temporary noise increase at any location that is already exposed to excessive noise levels from stationary source operational noise. Based on the existing ambient noise monitoring effort, the documented existing ambient noise levels on the project site adjacent to Dublin Canyon Road average 66.7 dBA L_{dn}, as measured at approximately 40 feet from the edge of the roadway. These noise levels are considered conditionally acceptable for residential land uses and do not constitute a significant cumulative noise impact.

In addition, as shown in the analysis above, noise generated by the proposed project's mechanical ventilation equipment would attenuate to 18 dBA L_{eq} at the nearest receiving property line. These noise levels would not be audible above existing ambient noise levels as measured at the nearest sensitive receptor land uses. Furthermore, no cumulative projects are located within 500 feet of the project site that would contribute to a cumulative stationary source noise impact with the proposed project. Therefore, implementation of the proposed project would not result in a cumulatively considerable contribution to less than significant cumulative stationary source noise impacts in the project vicinity. This impact would be less than significant.

Construction Vibration Impacts

Construction-related groundborne vibration impacts are very localized; therefore, only areas within approximately 50 feet of a construction site could potentially be affected by groundborne vibration resulting from construction activities. There are no cumulative construction development projects that are potential sources of groundborne vibration in the project vicinity to which the proposed project would contribute. Accordingly, cumulative impacts would be less than significant. Therefore, since there is not a cumulative groundborne vibration impact in the relevant geographic scope, then implementation of the proposed project would result in a cumulatively considerable contribution to a less than significant cumulative impact related to construction groundborne vibration. This impact would be less than significant.

Operational Vibration Impacts

The only cumulatively considerable contribution to groundborne vibration conditions in the project vicinity would result from introduction of new permanent sources of groundborne vibration to an existing impacted environment. Implementation of the proposed project would not include any permanent sources that would expose persons in the project vicinity to groundborne vibration levels that could be perceptible without instruments at any existing sensitive land use in the project

vicinity. In addition, there are cumulative projects that include significant permanent sources of groundborne vibration in the relevant geographic scope to which the proposed project would be exposed. Therefore, implementation of the proposed project would not result in a cumulatively considerable contribution to ongoing operational groundborne vibration conditions in the project vicinity. This impact would be less than significant.

Airport Noise Impacts

The geographic scope of the cumulative noise analysis is limited by the range of potential noise impacts. Noise impacts for airport-related noise sources are limited to the areas within the airport's 65 dBA CNEL noise contours. As identified above, the project site is located well outside of the 65 dBA CNEL airport noise contours. Therefore, existing noise levels do not constitute an existing noise impact. There is no cumulative impact. In addition, the proposed project would not contribute to any perceptible increase in airport noise in the project vicinity. Therefore, implementation of the proposed project would not result in a potentially significant cumulatively considerable contribution to cumulative airport noise impacts in the project vicinity. There would be no cumulative impact.

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3.12 - Public Services

3.12.1 - Introduction

This section describes the existing public services and potential effects from project implementation on the site and its surrounding area. Descriptions and analysis in this section are based, in part, on information provided by the City of Pleasanton General Plan, the Pleasanton Unified School District (PUSD), the California Department of Education, and the East Bay Regional Parks District (EBRPD). Additional information was provided through correspondence with the Livermore-Pleasanton Fire Department (LPFD) and the Pleasanton Police Department (PPD) (Appendix H).

No public comments were received during the Draft Environmental Impact Report (Draft EIR) Notice of Preparation (NOP) scoping period related to public services.

3.12.2 - Environmental Setting

Fire Protection and Emergency Medical Services

County of Alameda

The Alameda County Fire Department (ACFD) serves approximately 508 square miles with a daytime population of 400,000 people.[1] It consists of four battalions, 28 fire stations, 26 engine companies, two ambulances, one hand crew, seven ladder truck companies, and one heavy rescue vehicle. Additionally, it includes an air/light support unit, three Zodiac boats, a 2,000-gallon water tender, two bulldozers, and a hazardous material response vehicle. The ACFD has 545 authorized positions and 50–75 reserve firefighters as of 2024.

The ACFD is divided into four branches: Operations, Special Operations, Fire Prevention, and Administrative Support Services.[2] Additionally, the services they provide are: advanced life support, fire suppression, hazardous materials response, urban search and rescue, water rescue, community outreach and education, disaster preparedness, fire prevention and code compliance, and regional dispatch.[3]

Response and Activity Statistics in Unincorporated Alameda County for the Fiscal Year 2019–2020 are detailed in Table 3.12-1.

Table 3.12-1: Response and Activity Statistics in Unincorporated Alameda County

Category	Number
Structure Fires	203
Other Fires	315
EMS/Rescue	11,697
Hazardous Conditions	286

[1] Alameda County Fire Department (ACFD). 2025. About Us. Website: https://fire.acgov.org/about-us/. Accessed February 25, 2025.
[2] Alameda County Fire Department (ACFD). 2025. FAQS. Website: https://fire.acgov.org/faqs/. Accessed February 25, 2025.
[3] Alameda County Fire Department (ACFD). 2025. About Us. Website: https://fire.acgov.org/about-us/. Accessed February 25, 2025.

Category	Number
Service Calls	1,082
Good Intent	949
False Call	636
Canceled Enroute	1,525
Total Calls	16,693
Source: Alameda County Fire Department (ACFD). 2020	

City of Pleasanton

LPFD has 10 fire stations that provide fire protection and Emergency Medical Services (EMS) to a 49.45-square-mile area encompassing the City of Livermore, the City of Pleasanton, Pleasanton Ridge, Lawrence Livermore National Laboratory, and various unincorporated areas of Alameda County. LPFD maintains 10 stations, one headquarters, and one training center. The fire headquarters, the training center, and five of the stations are located in Pleasanton, fielding an on-duty force of 18 personnel per day. The remaining five fire stations are located in Livermore. LPFD is headquartered at Station No. 1, located at 3560 Nevada Street in Pleasanton.[4]

The LPFD has a daily operations fleet of 24 vehicles. In Pleasanton, the daily operations use four Type 1 Fire Engines, one Type 1 Aerial Ladder Tiller Truck, two Type 3 Fire Engines, two Type 6 Fire Engines, one Hazardous Materials Response Unit, one Utility Terrian Vehicle (UTV), one Inflatable Rescue Boat (IRB), one Battalion Chief SUV Command Vehicle.[5]

According to the Pleasanton General Plan, LPFD employs 117 full-time personnel, 24 reserve personnel, and 36 volunteer personnel. All firefighters are trained Emergency Medical Technicians and State Certified Firefighters I and II with specialized defibrillator training. A total of 53 personnel are Advanced Life Support Paramedics. As of 2013, LPFD had 0.68 sworn firefighter per 1,000 residents within its service area.

Response Times and Protocols

The majority of the City lies within a 5-minute travel time from one of the five fire stations. The City requires developments located outside the 5-minute travel time or located in Special Fire Protection Areas to provide additional fire mitigation measures, which include, at a minimum, automatic fire sprinkler systems.[6]

LPFD's arrival standard goal is an overall response time of 7 minutes, 90 percent of the time. When the first units for a structure fire are dispatched from one of the staffed emergency response companies, the three closest engines, a ladder truck, and the shift Battalion Chief are automatically assigned. In

[4] Livermore-Pleasanton Fire Department (LPFD). 2025. Fire Stations. Website: https://www.lpfire.org/about-us/fire-stations. Accessed February 25, 2025.
[5] Livermore-Pleasanton Fire Department (LPFD). 2023. Year-End Report–2023. Website: https://www.lpfire.org/home/showpublisheddocument/11975/638641612425800000. Accessed February 25, 2025.
[6] City of Pleasanton. 2008. Proposed Pleasanton General Plan 2005–2025 Draft Environmental Impact Report, Public Services, Fire Protection and Emergency Response Services. Website: cop-gen-plan-2005-25.pdf. Accessed February 25, 2025.

addition, a private sector medic ambulance can be dispatched in the event one of the occupants of the structure or LPFD personnel needs medical assistance at the scene.[7]

In the City of Pleasanton, LPFD serves a response area of 24 square miles and a population of 82,270 as of 2020.[8] The total incidents in 2023 were 16,597: 500 Fire Incidents, 10,763 Emergency Medical Incidents, 317 Hazardous Conditions Incidents, eight Explosions/Ruptures, 2,570 Good Intent, 1,452 Public Assist, 964 False Alarms, and 23 Weather/Other.[9] LPFD in the City had an average total reflex time of 7 minutes, 22 seconds for fire and 7 minutes, 58 seconds for EMS in 2023.[10] These response times indicate that the City is not operating in compliance with the stated goal for overall response time.

Mutual Aid

LPFD is responsible for fire protection and suppression for all areas within the city limits, in addition to providing contractual services in a number of developed areas outside the city limits. For larger structure and wildland fires, LPFD participates in the Alameda County and Statewide fire mutual aid agreements, which provide for additional fire suppression services, personnel, and support equipment. LPFD provides Fire and EMS services to the Veterans Hospital—Livermore by contract.

Emergency Medical Response

Of the 16,597 calls to service undertaken by LPFD in 2023, 10,763 (or approximately 64.8 percent) were emergency medical incidents.[11] LPFD is the primary first responder to these calls. All fire station companies include a State-licensed paramedic (who is also a captain, engineer, or firefighter) on every shift, while all firefighters are trained as Emergency Medical Technicians and paramedics. Field personnel can provide medical interventions for both adult and pediatric patients suffering from a multitude of conditions ranging from medical conditions to traumatic injuries.

Project Site

LPFD would serve the project site. The three fire stations closest to the project site are: Station No. 2 at 6300 Stoneridge Mall Road (approximately 2 miles east of the project site), Station No. 4 at 1600 Oak Vista Way (approximately 5.6 miles southeast of the project site), and Alameda County Fire Station No. 16 at 6200 Madigan Road in Dublin (approximately 2.3 miles northeast of the project site). There are currently two residences on the project site generating fire protection and emergency response needs.

Police Protection

City of Pleasanton

The PPD provides police protection within the Pleasanton city limits.

[7] City of Pleasanton. 2008. Proposed Pleasanton General Plan 2005–2025 Draft Environmental Impact Report, Public Services, Fire Protection and Emergency Response Services. Website: cop-gen-plan-2005-25.pdf. Accessed February 25, 2025.
[8] Livermore-Pleasanton Fire Department (LPFD). 2020. Year-End Report–2020. Website: https://www.lpfire.org/home/showpublisheddocument/6001/637575327264800000. Accessed February 25, 2025.
[9] Livermore-Pleasanton Fire Department (LPFD). 2023. Year-End Report–2023. Website: https://www.lpfire.org/home/showpublisheddocument/11975/638641612425800000. Accessed February 25, 2025.
[10] Ibid.
[11] Ibid.

Police Facilities

The PPD is currently headquartered at 4833 Bernal Avenue, Pleasanton, approximately 6 miles from the proposed project site. The Chief of Police oversees the entire PPD. The PPD contains a Patrol Operations Division and Investigation and Services Division, each managed by one Police Captain. The Operations Division not only patrols the City, but it also includes a traffic enforcement unit, a canine unit, SWAT, and special events. The Investigations and Support Services Division includes the Professional Standards unit, Criminal Investigations unit, Youth and Community Services unit, and Support Services unit covering dispatch and records. The Investigations and Support Services Division is responsible for the following activities and support functions: criminal investigations, property/evidence, crime analysis, school resource officers, crime prevention, personnel and training, professional standards, fleet maintenance, and dispatch and records management.

The PPD is budgeted for 118.5 full-time positions (83 peace officers and 35.5 professional support positions [public safety dispatchers, records personnel, an animal control officer and community service officers]).[12] In 2024, the PPD was not at full staffing, operating around 71 percent of deployable capacity, despite increased efforts to hire and train new officers.[13]

Police Activity

The PPD responded to a total of 59,841 total incidents in 2023.[14] Of the total police incidents fulfilled by the PPD in 2023, 21,331 were initiated by officers and 38,510 were called in by the community. Table 3.12-2 provides a summary of incoming call trends for 2020 through 2023.

Table 3.12-2: Police Activity Summary (2020–2023)

Category	2020–2022 Average	2023
Officer Initiated	24,503	21,331
Calls for Service	36,295	38,510
Total	**60,798**	**59,841**
Traffic Stop	10,347	9,345
Patrol Stop	7,976	4,500
Alarm	2,083	2,175
Suspicious Vehicle	1,786	2,010
Pedestrian Stop	1,302	3,214
Illegal Parker	1,553	2,054
Disturbance	1,553	1,535
Welfare Check	1,465	1,450

[12] City of Pleasanton. 2025. Our Police Department. Website: https://www.cityofpleasantonca.gov/our-government/police/department-overview/. Accessed February 25, 2025.
[13] Pleasanton Police Department (PPD). 2025. PD Staffing Memo. Website: https://www.cityofpleasantonca.gov/our-government/police/department-overview/. Accessed February 25, 2025.
[14] Pleasanton Police Department (PPD). 2025. Annual Report 2023. Website: https://www.cityofpleasantonca.gov/our-government/police/news-publications/. Accessed February 25, 2025

Category	2020–2022 Average	2023
Suspicious Person	935	1,268
Animal Call	885	1,300

Source: Pleasanton Police Department (PPD). 2025. Annual Report 2023. Website: https://www.cityofpleasantonca.gov/our-government/police/news-publications/. Accessed February 25, 2025.

Response Times

The average response time for non-emergencies in 2023 was 24 minutes and 57 seconds, compared with 23 minutes 03 seconds in 2021. The average response time for emergency calls in 2023 was 5 minutes and 19 seconds, and in 2022 it was 4 minutes and 19 seconds.[15] This increase in response time is likely tied to the shortages in staffing and replacements being newer recruits who require more time and training noted in the annual report. General Plan Policy 27 of the Public Safety Element sets the goal of an average police response time for 4 minutes for emergency calls and 16 minutes for general service calls, indicating that the City does not currently meet the operational goal for average response time for either general service goals or emergency service calls.

Project Site

The project site would be served by the PPD. The nearest police station is located approximately 4.45 miles southeast of the project site at 4833 Bernal Avenue. There are currently two residences on the project site generating a demand for police protection.

Schools

City of Pleasanton

The PUSD provides preschool through twelfth grade education to the City and surrounding unincorporated areas. PUSD has 16 schools and three early education programs serving the City.[16] PUSD serves approximately 13,662 students with 1,459 employees across one preschool, nine elementary schools, three middle schools, and three high schools. Additionally, PUSD has a 96 percent graduation rate.

Table 3.12-3 summarizes the three schools that currently serve the project site, based on most recent information provided by PUSD[17] and the California Department of Education.

Table 3.12-3: School Enrollment (2023)

School	Grades	Enrollment[1]	Enrollment Capacity[2]
Lydiksen Elementary	K–5	610	700
Thomas S. Hart Middle School	6–8	1,051	1,200

[15] Pleasanton Police Department (PPD). 2025. Annual Report 2023. Website: https://www.cityofpleasantonca.gov/our-government/police/news-publications/. Accessed February 25, 2025
[16] Pleasanton Unified School District (PUSD). At a Glance. Website: https://www.pleasantonusd.net/. Accessed February 25, 2025.
[17] Pleasanton Unified School District (PUSD). School Locator. Website: https://www.schoolsitelocator.com/apps/pleasanton_2425/. Accessed February 25, 2025.

School	Grades	Enrollment[1]	Enrollment Capacity[2]
Foothill High School	9–12	2,208	2400

Source:
1 California Department of Education. Pleasanton Unified. Website: https://www.cde.ca.gov/SchoolDirectory/results?districts=40&status=1&search=1. Accessed February 25, 2025.
2 Response to request of information by FirstCarbon Solutions (FCS) from Pleasanton United School District (PUSD) by Janet Wolfinger, 2019.

Project Site

The project site is within the service area of the PUSD. The project site would be served by Lydiksen Elementary at 7700 Highland Oaks Drive (approximately 2 miles southeast from the project site), Thomas S. Hart Middle School at 4433 Willow Road (approximately 3.1 miles southeast), and Foothill High School at 4375 Foothill Road (approximately 2.38 miles southeast). According to a request for information to PUSD in 2019, the student generation rates per household were listed as (K–5): 0.378, (6–8): 0.164, and for (9–12): 0.173.

Library Services

City of Pleasanton

The Pleasanton Public Library, located at 400 Old Bernal Avenue, provides library services to the City of Pleasanton.[18] The Pleasanton Public Library maintains a 30,178-square-foot library facility, which equates to approximately 0.404 square feet of library space per capita.[19] As of July 2019, there were 43,523 active library cardholders, and there were 10,396 new registered library cardholders in 2018. Additionally, there were 1.1 million total library materials checked out in 2018.[20]

Project Site

The nearest library to the proposed project site is the Pleasanton Public Library, located approximately 4.40 miles southeast of the project site. There are currently two residences on the project site generating library service needs.

Parks

City of Pleasanton

The City's park system includes 46 community and neighborhood parks, approximately 60 miles of trails, and over 700 acres of undeveloped open space.[21] The Parks Maintenance Division maintains over 385 developed acres of parkland and 832 acres of open space parkland, for a total of 1,217

18 City of Pleasanton. 2024. Library. Website: https://www.cityofpleasantonca.gov/gov/depts/lib/default.asp. Accessed February 25, 2025.
19 Ibid.
20 Pleasanton Library. Strategic Plan 2019–2024. Website: https://www.cityofpleasantonca.gov/your-community/pleasanton-library/. Accessed February 25, 2025.
21 City of Pleasanton. 2025. City Parks. Website: https://www.cityofpleasantonca.gov/gov/depts/cs/parks/default.asp. Accessed February 24, 2025.

acres.[22] The City had an estimated population of 74,653 as of July 1, 2023.[23] The City of Pleasanton General Plan establishes a standard of 5 acres of neighborhood or community parks per 1,000 residents. Therefore, the City is providing approximately 16.3 acres of parkland per 1,000 residents and is meeting its parkland standard.

Existing City park facilities near the project site are summarized below.

The Preserve and Moller Ranch Trails

Access to the Preserve trails is located at 5850 Laurel Creek Drive, approximately 4,850 feet from the project site. This park contains over 3 miles of trails for hikers and equestrians.

Moller Park

Moller Park is a neighborhood park located at 5500 Pleasant Hill Road, approximately 1.44 miles from the site of the proposed project. It is 7 acres and has barbecue grills, picnic area and tables, play equipment, and walkways.

Muirwood Community Park

Muirwood Community Park is located at 4710 Muirwood Drive, approximately 2.06 miles from the site of the proposed project. It is 13.9 acres and has barbecue pits, basketball court, dog park, picnic area and tables, play equipment restrooms, soccer field, softball diamond, tennis courts, and walkways.

East Bay Regional Park District

The closest park facilities near the site are managed by the EBRPD. The EBRPD is a system of parks lying east of San Francisco in Alameda and Contra Costa Counties. It contains 73 parks that contain 126,809 acres, 1,330 miles of trails and 55 miles of shoreline.[24] Existing regional park facilities near the plan area are summarized below.

Pleasanton Ridge Regional Park

The northern portion of Pleasanton Ridge Regional Park is located adjacent to the southern boundary of the project site, but there is currently no access provided from the project site. Access to the park is provided from the Foothill Staging area, which is approximately 6.5 miles south of the project site and provides 120 parking spaces. The park encompasses over 9,000 acres across the Pleasanton and Sunol Ridges and has a large multi-purpose trail system for hikers, equestrians, and bicyclists.

Dublin Hills Regional Park

Donlon Point Staging Area, located approximately 1 mile northwest of the site of the proposed project, is the entry point for Dublin Hills Regional Park and contains access to the Calaveras Ridge Regional Trail. Dublin Hills Regional Park is located in Dublin, California. It is 654 acres and has trails

[22] City of Pleasanton. 2025. Parks Maintenance. Website: https://www.cityofpleasantonca.gov/gov/depts/os/parks/default.asp. Accessed February 24, 2025

[23] United States Census Bureau. 2022. QuickFacts: Pleasanton city, California. Website: https://www.census.gov/quickfacts/fact/table/pleasantoncitycalifornia/PST045222. Accessed February 24, 2025.

[24] East Bay Regional Parks District (EBRPD). 2025. About Us. Website: https://www.ebparks.org/about-us. Accessed March 3, 2025.

that allow for hiking, biking, and horseback riding and is considered kid-Friendly. The park does not have facilities in the park as it is an undeveloped open space preserve. At the Donlon Point Staging Area there is a restroom, drinking fountain, and parking lot. [25]

Community Facilities

The Public Works Department is responsible for the operations and maintenance of the City's infrastructure and administers many quality of life services, such as:

- Callippe Preserve Golf Course
- Graffiti removal
- City Landscape and Tree Preservation Ordinance
- Street sweeping
- Water distribution
- Clean Water Program
- Regional Groundwater Facilities Project
- Flood and Floodplain Information
- Sewer collection
- Storm drainage systems
- Utility billing
- Weed abatement
- Maintenance services to City buildings
- Recycled Water Program
- Water Conservation Program.[26]

3.12.3 - Regulatory Framework

State

California Building Code

The California Building Standards Code (CBC) provides minimum standards for general building design and construction requirements to ensure the construction, use, alteration, expansion, and demolition of buildings and structures within the State of California are secure, robust, sanitized, and sustainable. The CBC is Part 2 of Title 24 in the California Code of Regulations and is published every 3 years, along with emergency supplements in between. The most recent edition was released in 2022, with each release being developed from building standards that have been adopted from the national model code, by stage agencies, and standards that have been developed by the California legislature to address California's complex and changing conditions. All projects and developers in California are to follow CBC standards along with additional amendments adopted by stage agencies and local jurisdictions due to specific natural conditions. The CBC mandates many fire safety requirements, such as sprinkler installation on high-rise buildings, fire-resistant standards for building materials, and defensible space standards within areas susceptible to wildfire hazards.

California Fire Code

The California Fire Code incorporates policies and regulations adopted from the International Fire Code, along with State and local amendments that are established to adapt to unique and complex natural conditions found within California. The objectives of the California Fire Code are to mandate regulations to safeguard life and property from dangerous and hazardous conditions that can cause the unexpected ignition and spread of wildfire in both natural and built environments. It is Part 9 of 13 parts in Title 24 within the California Code of Regulations and is published every 3 years, with

[25] East Bay Regional Parks District (EBRPD). 2025. Dublin Hills Regional Open Space Preserve. Website: https://www.ebparks.org/parks/dublin-hills. Accessed March 3, 2025.

[26] City of Pleasanton. 2025. Operation Services. Website: https://www.cityofpleasantonca.gov/our-government/public-works/. Accessed April 2, 2025.

potential necessary supplements in between years. The most recent edition was released in 2022 with a supplement passed in July of 2024.

California Health and Safety Code

The California Health and Safety Code Division 12 – Fires and Fire Protection provides rules and regulations pertaining to a variety of fire safety measures including building mandates, hazards handling, building inspections, and the responsibilities of the State Fire Marshal and Board of Fire Services. Policies related to the proposed project within Division 12 – Fire and Fire Protection are listed below.

- **Section 13100.1:** The functions of the State Fire Marshal along with CAL FIRE shall be to foster, promote, and develop strategies to protect life and property against fire and panic.
- **Section 13104.6:** The State Fire Marshal may determine the existence of a fire hazard on a property which has been deeded to the State for taxes and may serve a written notice of condemnation of the fire hazard on the State Controller, or on any person designated by the Controller. The fire hazard is then subject to removal in accordance with the law relating to removal of public nuisances on tax deeded property.

California Government Code, Section 65995(b) and Education Code, Section 17620

Senate Bill (SB) 50 (funded by Proposition 1A, approved in 1998) limits the power of cities and counties to require mitigation of school facilities impacts as a condition of approving new development and provides instead for a standardized developer fee. SB 50 generally provides for a 50/50 State and local school facilities funding match. SB 50 also provides for three levels of statutory impact fees. The application level depends on whether State funding is available, whether the school district is eligible for State funding, and whether the school district meets certain additional criteria involving bonding capacity, year-round school, and the percentage of movable classrooms in use.

SB 50 amended Section 65995 of the California Government Code, which contains limitations on Section 17620 of the Education Code, the statute that authorizes school districts to assess development fees within school district boundaries. Section 65995(b)(3) of the Government Code requires the maximum square footage assessment for development to be increased every 2 years, according to inflation adjustments.

As of January 1, 2025, the allowable amount of statutory school facilities fees (Level I School Fees) are $5.17 per square foot of assessable space for residential development of 500 square feet or more, and $0.84 per square foot of chargeable covered and enclosed space for commercial/industrial development. School districts may levy higher fees if they apply to the State and meet certain conditions.

The fees set forth in the Government Code constitute the exclusive means of both “considering” and “mitigating” a project’s impacts on school facilities (California Government Code § 65996(a)). In amending the Government Code, the legislature “deemed [the fee] to provide full and complete school facilities mitigation” (California Government Code § 65996(b)).

Regional

East Bay Regional Park District Master Plan

The EBRPD Master Plan is EBRPD's official guide for planning its future facilities. It was originally adopted in 1973 and is periodically updated to reflect changing circumstances, with the most recent update adopted in 2013. The Master Plan is intended to maintain a balance between the need to protect and conserve natural resources with the need for recreational use of parklands. It also contains a "Master Plan Map" that graphically illustrates EBRPD's existing and planned open space areas, parks, and trails.

Local

City of Pleasanton

General Plan

The City of Pleasanton General Plan sets forth the following goals, policies, and programs that are relevant to public services:

Public Safety Element

Fire Hazards and Emergency Response

Goal 3 Minimize the risks to lives, property, and the environment due to fire hazards within the Planning Area, and provide the highest quality of emergency response service feasible.

Policy 8 Provide an adequate level of fire and emergency medical equipment and personnel to protect the community.

Program 8.2 Require new development to pay for fire safety improvement needs generated by the new development.

Policy 9 Strive to enhance emergency medical response in Pleasanton.

Policy 10 Strive to respond to all emergency fire-related calls within seven minutes of the time the call for service is received 90 percent of the time.

Policy 11 Maintain or improve the City's existing Insurance Services Office fire protection rating of three.

Policy 13 Require fire mitigation measures in new and existing developments that reduce the fire threat to the structure and occupants. Require development outside the five-minute travel time and in Special Fire Protection Areas to provide effective fire prevention measures.

Police Services

Goal 8 Provide the highest quality of Police services within the City.

Policy 26 Work in collaboration with the community to provide the highest level of Police services, making Pleasanton a safer place to live, work and play.

Program 26.2 Require new development to pay for police safety improvements required of that development.

Policy 27 Strive for a response time of an average of four minutes for emergency calls, and sixteen minutes for general service calls.

Policy 29 Seek ways to reduce police service demands through the contemporary practice of "Crime Prevention Through Environmental Design."

Program 29.1 Incorporate crime reduction and public safety response features in the design and planning of private and public development.

Program 29.2 Submit all discretionary use permits to the Police Department for analysis of, and recommendations to reduce, impacts on police services.

Public Facilities and Community Programs Element

Schools and Education

Goal 4 Promote lifelong learning.

Policy 7 Encourage and support high quality public and private educational facilities in Pleasanton and facilitate lifelong educational opportunities for all ages.

Program 7.1 Work with the School District to locate school sites to preserve the quality of life of existing and new neighborhoods.

Library Facilities and Programs

Goal 3 Promote responsible financing and construction to preserve and enhance Pleasanton's public facilities.

Policy 2 Development should pay its fair share for the construction and use of municipal facilities.

Program 2.1 Require future development to pay its fair share of the cost of purchasing sites and financing needed improvements for existing and future municipal facilities, such as a city hall, fire stations, athletic facilities, libraries, cultural arts center, etc.

Goal 5 Enhance the quality of Pleasanton library services.

Policy 9 Provide sufficient sites and improvements for a full range of library facilities to serve existing and future development.

Parks and Recreation

Goal 6 Achieve a complete park and recreation system featuring a wide variety of opportunities to serve the public need.

Policy 10 Provide sufficient parkland and recreational activities to accommodate existing and future needs of residents, workers, and visitors.

Program 10.2 Encourage developers to dedicate public park acreage in areas designated for park use on the General Plan Map rather than contribute in lieu fees.

Program 10.3 Disperse neighborhood and community parks throughout the City and combine them with areas of natural, scenic, or cultural resources.

Program 10.4 Provide a wide variety of active and passive recreational facilities to accommodate the needs of all ages in a diverse and inclusive community. Conduct periodic public surveys to ascertain the park and recreational needs of the community

Program 10.5 Develop neighborhood, community, and regional parks in accordance with the General Plan goals and the land use diagram.

Program 10.18 Maintain at least the standard of 5 acres of neighborhood or community parks per 1,000 people.

Program 10.22 Provide trails, bike routes or pedestrian walkways to connect the parks and recreational facilities throughout Pleasanton.

3.12.4 - Methodology

FirstCarbon Solutions (FCS) evaluated potential impacts on public services through review of the General Plan and various service providers' websites and available information.

3.12.5 - Thresholds of Significance

The Lead Agency utilizes the criteria in the California Environmental Quality Act (CEQA) Guidelines Appendix G Environmental Checklist to establish thresholds of significance to determine whether impacts to public services are significant environmental effects. As such, the City has determined that the proposed project would have a potential impact if it would:

> . . . result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
>
> a) Fire protection.
> b) Police protection.
> c) Schools.
> d) Parks.
> e) Other public facilities.

3.12.6 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the development of the proposed project and provides mitigation measures where appropriate.

Fire Protection

Impact PUB-1:	**The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection.**

Impact Analysis

The project site would continue to be served by the LPFD upon project implementation. The three stations closest are Station No. 2 at 6300 Stoneridge Mall Road (2 miles east of the project site), Station No. 4 at 1600 Oak Vista Way (5.6 miles southeast of the project site), and Alameda County Fire Station No. 16 at 6200 Madigan Road in Dublin (2.3 miles northeast of the project site). There are currently two residences on the project site generating fire protection and emergency response needs. Project implementation would generate increased demand for fire protection services as a result of increased development and residential population on the project site; however, overall population in the LPFD service area has declined since 2019.[27]

The Pleasanton Municipal Code contains rules and regulations related to fire protection services and payment of public service fees. Notably, the proposed project would be required to pay capital facilities fees, as outlined in Chapter 3.22 of the Municipal Code, which would accommodate any need for additional staffing or resources to respond to service calls. Additionally, the proposed project would be required to demonstrate compliance with Chapter 20.24 of the Municipal Code, which implements the California Fire Code on a local level and requires new development projects to meet fire protection and emergency access requirements, including installation of fire sprinklers, fire alarms, and fire extinguishers that meet Municipal Code requirements and are appropriately located within proposed buildings or structures.

As part of the approval and permitting process, the LPFD would review the proposed project to ensure that all new improvements meet State and local Building and Fire Code requirements. Further, once operational, the proposed project would be subject to the Fire Department's inspection program, which would ensure compliance with applicable State and local standards, including requirements for emergency access.

Program 10.2 requires that a system of fire hazard mitigations be developed based on the probability of occurrence and the number of people at risk. The proposed project is within a 5-minute response time of a fire station, per Figure 5-6 in the Public Safety section of the General Plan.

Although the proposed project would nominally increase demand for fire protection services, the proposed project would be constructed in accordance with applicable Municipal Code and General Plan policies and programs and would be subject to City review and approval. The proposed project

[27] United States Census Bureau. 2025. QuickFacts: Pleasanton City, California. Website: https://www.census.gov/quickfacts/fact/table/pleasantoncitycalifornia/PST045224. Accessed March 13, 2025.

would not result in the construction of new or the expansion of existing fire protection facilities. Therefore, impacts associated with fire protection facilities would be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

Police Protection

Impact PUB-2:	**The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection.**

Impact Analysis

The project site would continue to be served by the PPD upon project implementation. The police department is located approximately 4.45 miles southeast of the project site at 4833 Bernal Avenue. There are currently two residences on the project site generating a demand for police and emergency response services. Project implementation would increase the demand for police protection services as a result of increased development and residential population on the project site; however, overall population in the PPD service area has declined since 2019.[28]

General Plan Public Safety Element Policy 27 sets forth an average police response time goal of 4 minutes for emergency calls and 16 minutes for general service calls. As discussed above, in 2023, the PPD's average response time for emergency calls was 5 minutes and 19 seconds and 24 minutes and 57 seconds for general service calls, which are beyond the City's targets.[29] Therefore, the City does not currently meet the operational goal for average response time for either general service goals or emergency service calls. This delayed response time is tied to the shortages in staffing and newer recruits requiring more time and training and is expected to improve. Existing facilities are sufficient to address these expected increases in staffing.

The proposed project could increase driving time and distance for officers responding to calls for service on the project site, as portions of the project site are located outside the City boundaries. However, the proposed project would be required to comply with all applicable laws, regulations, plans, and policies related to police protection services. Specifically, General Plan Public Facilities and Community Programs Element Program 2.1 requires development to pay its fair share of costs related to the purchasing of sites and financing of improvements for existing and future municipal facilities. Additionally, General Plan Program 29.1 requires that crime reduction and public safety

[28] United States Census Bureau. 2025. QuickFacts: Pleasanton city, California. Website: https://www.census.gov/quickfacts/fact/table/pleasantoncitycalifornia/PST045224. Accessed March 13, 2025.

[29] Pleasanton Police Department (PPD). 2023. Annual Report 2023. Website: https://www.cityofpleasantonca.gov/our-government/police/news-publications/. Accessed February 25, 2025

response features be incorporated into the design and planning of private and public developments, and General Plan Program 29.2 requires that all discretionary use permits be submitted to the PPD for analysis and recommendations to reduce impacts on police services.

Additionally, the Municipal Code contains rules and regulations related to police services and payment of public service fees. Chapter 3.22 of the Municipal Code requires that development projects pay capital facilities fees apportioned to the cost of the necessary public improvements associated with each development within the City. Payment of applicable capital facilities fees would ensure that police protection services would be able to meet the demands associated with the proposed project.

As such, the proposed project would not substantially impair the ability to maintain the above-referenced response time goals or increase the use of existing police protection facilities such that substantial physical deterioration, alteration, or expansion of these facilities would be required, thereby triggering environmental impacts. Impacts would be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

Schools

Impact PUB-3:	**The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools.**

Impact Analysis

In 2019, FCS staff reached out to the PUSD by email to get PUSD's input on the proposed project's potential impacts to schools within the northern area of the PUSD (Donlon and Fairlands). In their response, PUSD indicated that, as of 2019, Lydiksen Elementary School and Hart Middle School were impacted, and there were approximately 180 students who overflow to other schools out of the Donlon residential enrollment area. PUSD indicated that Foothill High School had existing capacity and could accommodate additional students associated with project implementation.

2024 data from PUSD shows that overall enrollment decreased from 2019 from 14,986 to 13,662, representing reduction of 1,324 students.[30] Using PUSD's K–12 Residential Single-Family Home Yield Factor of 0.72 students per household, the proposed project would be expected to generate approximately 20 students. This includes an estimated 11 K–5 students, five middle school students

[30] California Department of Education. 2024. Pleasanton Unified. Website: https://www.cde.ca.gov/SchoolDirectory/results?districts=40&status=1&search=1. Accessed February 25, 2025

(grades 6–8), and five high school students (grades 9–12).[31] Based on total enrollment capacities provided in Table 3.12-2 above, PUSD schools would have a remaining capacity of 79 elementary, 144 middle school, and 187 high school students at schools that serve the project site.

Further, while 2019 communications from PUSD indicated that schools within the northern area of PUSD are impacted, the district stated that enrollment associated with new residences on the project site could be accommodated at other schools within the PUSD. Depending on annual enrollment, PUSD could require students to overflow to other elementary schools if there is no space at a particular grade level at the neighborhood school.

As such, it is expected there would be sufficient school capacity to accommodate the proposed project and no new or expanded school facilities would be triggered thereby. Further, pursuant to State law, payment of the applicable school fees by the applicant constitutes full and complete mitigation under the law. Pursuant to Government Code Section 65995, payment of adopted applicable school fees is considered "full and complete mitigation" for impacts to school facilities, and local governments are prohibited from assessing additional fees or exactions for school impacts.[32]

With the payment of applicable school fees pursuant to State law, impacts associated with the proposed project would be fully mitigated, and impacts would be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

Parks

Impact PUB-4:	**The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks.**

Impact Analysis

The California Department of Parks and Recreation, EBRPD, and cities in the project vicinity maintain State, regional, and city parks, trails, and recreational facilities for public use. The Pleasanton General Plan establishes park standards. Specifically, Program 10.18 establishes standards to achieve a level

[31] Wolfinger, Janet. Administrative Assistant, Business Services, Pleasanton Unified School District (PUSD). Personal communication: Email. October 3, 2019.

[32] California Legislative Information. 2016. Chapter 4.9. Payment of Fees, Charges, Dedications, or Other Requirements Against a Development Project [65995-65998). Website: https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=65995. Accessed February 12, 2025.

of park facilities equal to 5 acres per 1,000 residents.[33] The City's park system includes 385 developed acres of parkland across 46 community and neighborhood parks, approximately 60 miles of trails, and over 700 acres of undeveloped open space.[34] The Parks Maintenance Division maintains over parkland and 832 acres of open space parkland for a total of 1,217 acres.[35]

The proposed net 28 single-family homes could be expected to increase population by approximately 74 people.[36,37] The proposed project would need to provide 0.37 acre of parklands to meet the City's standard of 0.005 acre of park facilities per person.[38] The City had an estimated population of 74,653 as of July 1, 2023.[39] Therefore, the City is providing approximately 16.3 acres of parkland per 1,000 residents. As a result, the City is fulfilling its acres of parkland to population goal. Even with the increase of 74 residents generated by the proposed project, the City would still meet its goal of 5 acres of parkland per 1,000 residents.

Furthermore, the proposed project would permanently preserve 117.1 acres of open space. Four types of open space would be preserved, including Parcel A: 39.8 acres of Homeowner's Association (HOA) owned open space; Parcel B: 69.3 acres of EBRPD open space and access road (inclusive of staging area site); and Parcel C: 7.7 acres of privately owned open space. Also, a gated, public staging area providing access to EBRPD with 16 parking stalls, four trailer parking stalls, and trail connections to Pleasanton Ridge would be constructed. The 39.8 acres of HOA open space would exceed the City's standard of 0.42 acres for the anticipated population growth created by the proposed project. Given the wide range of recreational opportunities available provided as part of the proposed project, the recreational needs of the anticipated 74 residents would be met.

The proposed project would not result in the need to construct new or expanded City park facilities. As such, impacts associated with the construction or expansion of park and recreational facilities would be less than significant.

Level of Significance Before Mitigation

No impact.

Mitigation Measures

None.

[33] City of Pleasanton. 2019. General Plan 2005–2025. August 20.
[34] City of Pleasanton. 2025. City Parks. Website: https://www.cityofpleasantonca.gov/gov/depts/cs/parks/default.asp. Accessed February 24, 2025.
[35] City of Pleasanton. 2025. Parks Maintenance. Website: Divisions https://www.cityofpleasantonca.gov/our-government/public-works/divisions/#parks-maintenance - City of Pleasanton. Accessed February 24, 2025.
[36] California Department of Finance (CDF). E-5 City/County Population and Housing Estimates. Website: https://dof.ca.gov/forecasting/demographics/estimates/. Accessed February 24, 2025.
[37] The City's average persons per household rate was 2.62. 2.62*28=73.36
[38] 74 persons times 0.005 acre per person equals 0.37 acre.
[39] United States Census Bureau. 2022. QuickFacts: Pleasanton city, California. Website: https://www.census.gov/quickfacts/fact/table/pleasantoncitycalifornia/PST045222. Accessed February 24, 2025.

Other Public Facilities

Impact PUB-5: **The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities.**

Impact Analysis

The Pleasanton Public Library, located at 400 Old Bernal Avenue, 4.4 miles southeast of the project site, provides library services to the City of Pleasanton.[40] The Pleasanton Public Library maintains a 30,178-square-foot library facility, which equates to approximately 0.404 square feet of library space per capita, below the City's goal of 1 square foot of library space per resident.[41]

In 2019, FCS staff reached out to the Pleasanton Public Library by email to get input on the proposed project's potential impacts to library facilities. The staff explained that the library currently had 45,394 card holders with their 30,000 square foot building. The response indicated that while library resources were already strained, the proposed project would not impact it any further or elevate it to a new level. The library would not expand its services for the new residents, and the new residents would be incorporated into the library's existing services.

Further, the General Plan includes policies and programs to ensure that library facilities keep pace with new development. Program 2.1 of Policy 2 of Goal 3 in Chapter 6, Public Facilities and Community Programs Element, requires development to pay its fair share of costs related to the purchasing of sites and financing of improvements for existing and future municipal facilities, including library facilities.

In compliance with Program 2.1, the project applicant would pay the applicable development impact fees to ensure a proportionate fair share contribution toward any future public facilities needed to serve the Town. The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for other public facilities. Impacts would be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

[40] City of Pleasanton. 2024. Library. Website: https://www.cityofpleasantonca.gov/gov/depts/lib/default.asp. Accessed February 25, 2025.

[41] 30,178 / 2023 population (74,653) = 0.404

3.12.7 - Cumulative Impacts

There are 17 residential applications, as of February 2025, for the City at various stages of approval and construction. The combined proposed increase of residential units is 1,503. Applying the 2024 resident per household rate for the City results in a possible increase of up to 3,938 people.[42] With the addition of population growth of the cumulative projects, the projected City population would be 78,591 based on the 2023 population.

The geographic scope of the cumulative impact analysis for public services is the City of Pleasanton and is delineated by the local service areas. This analysis evaluates whether the impacts of cumulative development could result in a cumulatively significant impact to public services. This analysis then considers whether incremental contribution to cumulative impacts associated with the implementation of the proposed project would be significant. Both conditions must be fulfilled for a project's cumulative effects to rise to a level of significance.

Fire Protection Facilities

The geographic scope of cumulative fire protection and EMS analysis is the LPFD service area. A significant cumulative environmental impact would result if cumulative growth exceeded the ability of LPFD to adequately serve their service areas, thereby requiring construction of new facilities or modification of existing facilities. The City's population has declined since 2019. The cumulative projects would result in an estimated population of 78,591 at buildout, which is 1,096 less people than the 2019 population. In 2019, the LPFD was able to handle the population of Pleasanton and provide the necessary services. Accordingly, it is anticipated that the LPFD would be able to serve the population with existing facilities. Moreover, development projects within the LPFD service area would be required to comply with City and County requirements that address fire protection and EMS, including the payment of impact fees designed to ensure adequate facilities. Accordingly, cumulative impacts would be less than significant.

LPFD's arrival standard goal is an overall response time of 7 minutes, 90 percent of the time. LPFD in the City had an average total reflex time of 7 minutes, 22 seconds for fire and 7 minutes, 58 seconds for EMS.[43] LPFD slightly exceeds its response time goals for urban, suburban, and rural populations. The proposed project would likely increase calls for service due to the increase in residential population; however, the increase would be less than 2019 levels and would be adequately served by existing facilities.

Accordingly, the proposed project's incremental contribution to the less than significant cumulative impacts would not be significant. As discussed under Impact PUB-1, implementation of the proposed project would not create a need for new or physically altered facilities. The proposed project would contribute to an increased number of emergency and public service calls due to the increased

[42] California Department of Finance (CDF). E-5 City/County Population and Housing Estimates. Website: https://dof.ca.gov/forecasting/demographics/estimates/. Accessed February 24, 2025.
[43] Livermore-Pleasanton Fire Department (LPFD). 2023. Year-End Report–2023. Website: https://www.lpfire.org/home/showpublisheddocument/11975/638641612425800000. Accessed February 25, 2025.

presence of structures, traffic, and population. These impacts would be mitigated by mandatory development impact fees.

Therefore, the proposed project's incremental contribution to fire protection and EMS would not be cumulatively considerable. The proposed project would not have a cumulatively significant impact related to fire and medical services.

Police Protection Facilities

The geographic scope of the cumulative police protection analysis is the service area of PPD. A significant cumulative impact would occur if cumulative growth exceeded the ability of PPD to adequately serve its service area, thereby requiring construction of new facilities or modification of existing facilities. The cumulative projects would result in an estimated population of 78,591, which is 1,096 fewer people than the 2019 population. In 2019, the PPD was able to handle the population of the City and provide the necessary services with existing facilities. Accordingly, cumulative impacts would be less than significant.

The General Plan Policy 27 of the Public Safety Element sets the goal of an average police response time for 4 minutes for emergency calls and 16 minutes for general service calls. As discussed in Impact PUB-2, PPD is over the response time goal for both types of calls. Because the proposed project would be subject to all laws, codes, policies, and regulations relating to growth management, such as those outlined in the General Plan, and because residential areas generate very few calls relative to the total volume of calls within the City, the proposed project's incremental contribution to the potentially significant cumulative impact would not be significant. The proposed project would result in an increased number of priority one and priority two calls in the area due to an increase in population; however, the increase in population would remain less than 2019 levels and would not, therefore, require the need for new facilities. Additionally, the proposed project would pay development impact fees. As such, the proposed project, in conjunction with other proposed projects, would not have a cumulatively significant impact related to police services.

School Facilities

Planned projects detailed in Chapter 3, Environmental Impact Analysis, of this Draft EIR would result in residential development, though none include educational facilities. Potential new students coming from the proposed project would be serviced by PUSD. The anticipated schools these students would attend are Lydiksen Elementary, Thomas S. Hart Middle, and Foothill High School. The PUSD anticipates that the students associated with the proposed project would be accommodated given the current capacity at these schools. However, because of grade configurations, program changes, and enrollment shifts, students associated with the proposed project and other planned projects may be diverted to other schools. However, the PUSD has the capacity to accommodate these students within the existing facilities.

The PUSD would be affected by the cumulative impact of all listed projects in Chapter 3, Environmental Impact Analysis, with an increased population. PUSD uses the K–12 Residential Single-Family Home Yield Factor, which is 0.716, which breaks down to 0.378 for elementary, 0.164 for middle, and 0.173 for high school. With the cumulative projected dwelling units being 1,503, this

would result in approximately 569 elementary, 247 middle school, and 260 high school students, for a total of 1,076 students. This increase in students, added to the 2024 student body population, would result in 14,738 students. This would be lower than the enrollment in 2019, which was 14,986. Accordingly, there would be a less than significant cumulative impact requiring the need for new or expanded facilities. Further, future developments in the City would be required to contribute their fair share through development impact fees, which fully mitigates for impacts to schools. Likewise, the proposed project would not introduce population growth that would require new facilities and the proposed project would be required to pay applicable school impact fees and, therefore, would not have a cumulatively considerable contribution to less than significant cumulative impacts associated with schools

Parks

The geographic scope of the cumulative park facilities analysis is the Pleasanton Recreation, Arts, and Community Services Department service area. An increase in population from the proposed project and cumulative development projects would result in an increased demand for park facilities. Program 10.18 establishes standards to achieve a level of park facilities equal to 5 acres per 1,000 population, or 0.005 acre per person. This cumulative effect of population growth would require 7.515 acres of parkland. As stated above, the City currently provides approximately 16.3 acres per 1,000 residents with a population of 74,653. With the addition of population growth of the cumulative projects, the projected population would be 78,591. Dividing that with the total 1,217 acres of parkland would result in 15.49 acres per 1,000 residents or 0.15 acre per person.

This is still well above the City goal of 0.005 acre per person, and while the increase in population will increase the use of parks, it is well below their maximum capacity ability. The cumulative impact would be less than significant. Additionally, cumulative residential projects would be required to provide parkland or pay applicable development fees. With payment of applicable park impact fees and/or otherwise satisfying park dedication obligations by cumulative projects, there would be a less than significant cumulative impact related to additional increased use and physical deterioration of existing parks and recreational facilities not already analyzed within the General Plan. Accordingly, cumulative impacts are less than significant.

Additionally, the proposed project is allocating 69.3 acres of open space parkland to EBRPD and would pay any applicable development fees. Therefore, the proposed project's incremental contribution would not be cumulatively considerable and cumulative impacts would be less than significant with respect to parks.

Library Facilities

The geographic scope of the cumulative library is the Pleasanton Library System. An increase in population from the proposed project and cumulative development projects would result in an increased demand for library facilities. To help offset this increase, cumulative developments would be required to pay development impact fees. The library is significantly below the target of desired space and resources since 2019 and needs a new building, satellite branches, or other facilities. However, while the library system would experience increased impact from cumulative projects including the proposed project, the impact would not exceed previous levels that have been able to

be serviced. The last analysis of library statistics was in 2019, when the population was 79,687. The cumulative projects would result in an estimated population of 78,591, which is 1,096 fewer people. In 2019, the library services were able to handle the population of the City and provide the necessary services.

The library has not shrunk or closed locations since then, so the cumulative impact would simply bring levels closer to the 2019 impact. This would not substantially change the status of impact beyond current levels. Accordingly, there would be a less than significant cumulative impact regarding the additional need for new or altered library facilities.

The proposed project would be required to pay applicable development impact fees. Therefore, the proposed project would not contribute significantly to cumulative impacts associated with libraries.

Level of Cumulative Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

3.13 - Recreation

3.13.1 - Introduction

This section describes existing parks and recreational facilities in the region and project area as well as the relevant regulatory framework. This section also evaluates the possible impacts related to parks and recreational facilities that could result from the implementation of the proposed project. Information in this section is based, in part, on information obtained from the Pleasanton General Plan, the City of Pleasanton website, and the East Bay Regional Parks District (EBRPD) website. No comments were received during the Draft Environmental Impact Report (Draft EIR) Notice of Preparation (NOP) scoping period related to recreation.

3.13.2 - Environmental Setting

Existing Parks and Recreational Facilities

State Parks

The California Department of Parks and Recreation (DPR) offers State parklands and trails throughout California. The DPR manages and preserves 280 State parks; 5,200 miles of trails; 3,195 historic buildings; and more than 11,000 known prehistoric and historic archaeological sites.[1] Mount Diablo State Park is the only State facility located within 10 miles of the project site.

Mount Diablo State Park

The only State Park within 10 miles of the project site is Mount Diablo State Park, located approximately 9.2 miles north of the project site. The nearly 20,000-acre park contains open land for camping, hiking, picnicking, horseback riding, mountain biking, and other recreational opportunities.[2] At the summit of Mount Diablo, park visitors are able to visit the Summit Building and Museum and have views of the surrounding area. Park gates are open year-round from 8:00 a.m. to sunset.

Project Site

There are no existing State parks, recreational facilities, or designated open spaces on the project site.

Regional Parks

The EBRPD offers regional parklands and trails in Alameda and Contra Costa counties. The EBRPD manages and preserves 126,809 acres and 1,330 miles of trails within 73 parks.[3] Seven regional parks and preserves are within 5 miles of the project site: Pleasanton Ridge Regional Park, Dublin Hills Regional Park, Bishop Ranch Open Space Regional Preserve, Five Canyons Open Space, Garin Regional Park, Don Castro Regional Recreation Area, and Dry Creek Pioneer Regional Park.

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1 California Department of Parks and Recreation (DPR).2025. About Us. Website: https://www.parks.ca.gov/?page_id=91. Accessed February 24, 2025

2 California Department of Parks and Recreation (DPR). 2025. Mount Diablo State Park. Website: https://www.parks.ca.gov/?page_id=517. Accessed February 24, 2025.

3 East Bay Regional Park District (EBRPD). 2025 About the District. Website: https://www.ebparks.org/about-us. Accessed February 24, 2025.

Dublin Hills Regional Park

Dublin Hills Regional Park is approximately 0.46 mile northwest of the project site in the City of Dublin. The 654-acre park contains trails for hiking, horseback riding, and biking, including a portion of the Calaveras Ridge Regional Trail. There are no developed facilities in the park. Park visitors have views of Donlon Point, Wiedemann Hill, and California Highlands. The park is open year-round beginning at 8:00 a.m. and closing at various times throughout the year, generally around sunset.[4]

Pleasanton Ridge Regional Park

Pleasanton Ridge Regional Park is approximately 0.93 mile south of the project site, mostly in the Cities of Pleasanton and Hayward. The 9,090-acre park contains a large trail system for hiking, horseback riding, and biking. There are no developed facilities in the park. Park visitors have views of Livermore Valley, Kilkare Canyon, Sunol Ridge, and Stoneybrook Canyon. The park is open year-round beginning at 8:00 a.m. and closing at various times throughout the year, generally around sunset.[5]

Bishop Ranch Open Space Regional Preserve

Bishop Ranch Open Space Regional Preserve is approximately 3.68 miles northwest of the project site, in Contra Costa County. The 806-acre preserve contains trails for hiking, horseback riding, and biking, open land for kite flying, and picnic areas. There is a visitor center in the park open weekends during the summer. Park visitors have views of Oak Hill Canyon and the Newt Pond Wildlife Area. The park is open year-round from 5:00 a.m. to 10:00 p.m.[6]

Garin Regional Park

Garin Regional Park is approximately 3.58 miles southwest of the project site in Alameda County. The park is adjacent to Dry Creek Pioneer Regional Park, and the two combined comprise over 5,800 acres. The park contains open land for nature study and guided interpretive programs, an apple orchard, picnic areas, trails for hiking, horseback riding, and biking, a kite field, and a fishing pond. There are no developed facilities in the park. Park visitors have views of nearby local and regional parks, canyons, and scenic Bay Area ridgelines. The park is open year-round beginning at 8:00 a.m. and closing at various times throughout the year, generally around sunset.[7]

Five Canyons Open Space

Five Canyons Open Space is approximately 3.89 miles west of the project site, mostly in the unincorporated community of Castro Valley. The over 300 acres of open space contain 5 miles of trails for hiking, horseback riding, and biking, including a portion of the Bay Area Ridge Trail. These trails connect to Hayward Area Recreation District parks, Don Castro Regional Park, and Cull Canyon Regional Recreation Area. There are no developed facilities in the park. Park visitors have views of

[4] East Bay Regional Park District (EBRPD). 2025. Dublin Hills Regional Park. Website: https://www.ebparks.org/parks/dublin-hills. Accessed February 24, 2025.

[5] East Bay Regional Park District (EBRPD). 2025. Pleasanton Ridge Regional Park. Website: https://www.ebparks.org/parks/pleasanton-ridge. Accessed February 24, 2025

[6] East Bay Regional Park District (EBRPD). 2025. Bishop Ranch Open Space Regional Preserve. Website: https://www.ebparks.org/parks/bishop-ranch. Accessed February 24, 2025

[7] East Bay Regional Park District (EBRPD). 2025. Garin/Dry Creek Pioneer Regional Parks. Website: https://www.ebparks.org/parks/garin-dry-creek. Accessed February 24, 2025.

nearby local and regional parks, canyons, and scenic Bay Area ridgelines. The park is open year-round from 8:00 a.m. to dusk.[8]

Dry Creek Pioneer Regional Park

Dry Creek Pioneer Regional Park is approximately 4.17 miles southwest of the project site, mostly in the City of Union City. The park is adjacent to Garin Regional Park, and the two combined comprise over 5,800 acres. The park contains open land for nature study and guided interpretive programs and trails for hiking, horseback riding, and biking. There is a historic cottage and 2-acre garden in the park; the garden is open 3 days a week, year-round. In February 2025, the Dry Creek Garden was closed until further notice due to storm damage. Park visitors have views of Tolman Peak. The park is open year-round beginning at 8:00 a.m. and closing at various times throughout the year, generally around sunset.[9]

Don Castro Regional Recreation Area

Don Castro Regional Recreation Area is approximately 4.92 miles west of the project site in the unincorporated community of Fairview. The 101-acre area contains a swim lagoon, a lake suitable for fishing, picnic areas, and trails connecting to the Bay Area Ridge Trail and Five Canyons Open Space. There is also a bathhouse and park office. The park is open year-round from 8:00 a.m. to 10:00 p.m. or 8:00 p.m. in winter months.[10]

Project Site

There are no existing regional parks, recreational facilities, or designated open spaces on the project site.

City Parks

The project site is located within unincorporated Alameda County and is surrounded to the north by the cities of Dublin and San Ramon, to the east by the City of Pleasanton, and to the south and west by other parts of unincorporated Alameda County. Nearby cities offer community parks and recreational facilities within their jurisdictions. Seventeen community parks and recreational facilities are located within 3 miles of the project site. The closest City parks to the project site are Dublin Heritage Park, located approximately 1.02 miles northeast of the project site, and Mape Memorial Park, located approximately 1.20 miles northeast of the project site. Table 3.13-1 provides a brief description of the 17 City parks within a 3-mile search radius of the project site, the recreational amenities that they feature, and the jurisdiction and park department in which the park is located.

[8] East Bay Regional Park District (EBRPD). 2025. Five Canyons Open Space. Website: https://www.ebparks.org/parks/five-canyons. Accessed February 24, 2025.

[9] East Bay Regional Park District (EBRPD). 2025. Garin/Dry Creek Pioneer Regional Parks. Website: https://www.ebparks.org/parks/garin-dry-creek. Accessed February 24, 2025

[10] East Bay Regional Park District (EBRPD). 2025. Don Castro Regional Recreation Area. Website: https://www.ebparks.org/parks/don-castro. Accessed February 24, 2025

Table 3.13-1: City Parks Within 3 Miles of Project Site

Name	Acreage	Distance from Project Site (miles)	Jurisdiction and Park Department	Amenities
Dublin Heritage Park and Museums	10	1.02	City of Dublin Parks and Community Services Department	• Barbecue grills • Drinking fountains • Picnic area and tables • Restrooms • Walkways/trails • Historic buildings/museums and cemetery • Classes, camps, events, tours
Mape Memorial Park	2.6	1.20	City of Dublin Parks and Community Services Department	• Barbecue grills • Drinking fountains • Picnic area and tables • Play equipment • Restrooms • Sand volleyball courts • Walkways/trails • Dogs permitted • Public art
Dolan Park	4.9	1.42	City of Dublin Parks and Community Services Department	• Barbecue grills • Basketball courts • Drinking fountains • Fitness equipment • Picnic area and tables • Walkways/trails • Dogs permitted • Public art
Moller Park	7	1.44	City of Pleasanton Recreation Department	• Barbecue grills • Picnic area and tables • Play equipment • Walkway
Shannon Park	10	1.58	City of Dublin Parks and Community Services Department	• Barbecue grills • Drinking fountains • Picnic area and tables • Play equipment • Restrooms • Walkways/trails • Water play area • Dogs permitted • Public art
Muirwood Community Park	13.9	2.06	City of Pleasanton Recreation Department	• Barbecue pits • Basketball court • Dog park • Picnic area and tables • Play equipment

Name	Acreage	Distance from Project Site (miles)	Jurisdiction and Park Department	Amenities
				• Restrooms • Soccer field • Softball diamond • Tennis courts • Walkways
Dublin Sports Grounds	22.8	2.11	City of Dublin Parks and Community Services Department	• Barbecue grills • Baseball and softball diamonds • Drinking fountains • Fields for rent • Picnic area and tables • Play equipment • Restrooms • Soccer fields • Walkways/trails • Dogs permitted • Lighted fields
Kolb Park	4.9	2.16	City of Dublin Parks and Community Services Department	• Barbecue grills • Drinking fountains • Fitness equipment • Picnic area and tables • Play equipment • Restrooms • Tennis courts • Walkways/trails • Dogs permitted • Public art
Val Vista Park	24	2.26	City of Pleasanton Recreation Department	• Barbecue pits • Baseball diamond • Pleasanton Community Garden • Picnic area and tables • Play equipment • Skate park • Soccer field • Public art
Centennial Park	5.25	2.28	City of San Ramon Department of Parks and Community Services	• Picnic area and tables • Play equipment • Restrooms • Walkways/trails
Oakhill Park	3.9	2.38	City of Pleasanton Recreation Department	• Picnic area and tables • Play equipment • Walkways

Name	Acreage	Distance from Project Site (miles)	Jurisdiction and Park Department	Amenities
Country Club School Park	7.11	2.57	City of San Ramon Department of Parks and Community Services	• Picnic Tables • Playground • Soccer Field • Baseball Field • Basketball Court • Volleyball Court • Available for public use outside school hours
Stagecoach Park	0.9	2.70	City of Dublin Parks and Community Services Department	• Barbecue grills • Drinking fountains • Picnic area and tables • Play equipment • Dogs permitted • Public art
Dougherty Hills Dog Park	1.1	2.71	City of Dublin Parks and Community Services Department	• Dog runs for big and small dogs • Doggie drinking fountain • Bench seating • Public art
Valley Trails Park	6.1	2.71	City of Pleasanton Recreation Department	• Barbecue pits • Basketball court • Picnic area and tables • Play equipment • Walkways
Richard Fahey Village Green Park	4.35	2.72	City of San Ramon Department of Parks and Community Services	• Baseball diamond • Soccer Field • Picnic area and tables • Play equipment • Restrooms • Walkways
Forest Home Farms Historic Park	16	2.91	City of San Ramon Department of Parks and Community Services	• Farm • Museum • Public events
Sources: City of Dublin. 2025. Parks. Website: https://www.dublin.ca.gov/1649/Parks. Accessed February 24, 2025. City of Pleasanton. 2025. Parks & Trails. Website: https://www.cityofpleasantonca.gov/your-community/parks-trails/. Accessed February 24, 2025. City of San Ramon. 2025. City of San Ramon Parks. Website: https://www.sanramon.ca.gov/cms/One.aspx?portalId=10826130&pageId=11692961. Accessed February 24, 2025. City of San Ramon. 2025. Forest Home Farms Historic Park. Website: https://www.sanramon.ca.gov/cms/One.aspx?portalId=10826130&pageId=11666001. Accessed February 24, 2025.				

Table 3.13-2 provides a brief description of the five closest City of Pleasanton recreational facilities to the project site, the distance from the project site, size of the facility, and amenities available.

Table 3.13-2: Pleasanton Recreation Facilities

Name	Distance from Project Site (miles)	Size (acres)	Amenities
Firehouse Arts Center	5	0.37	• Performing arts center • 221-seat theater • 1,800 square feet of classroom space • A fine arts gallery • On-site parking • ADA-compliant accommodations, for meetings, activities, and other special events
Dolores Bengtson Aquatics Center	5.2	1.77 acres	• 50-meter Olympic-size pool • Shallow pool with waterslide • 25-meter L-shaped lap pool with attached diving well and two 1-meter diving boards • Areas for picnics and lounging poolside • Pools heated to 80 degrees, year-round • ADA accessibility • Locker room • Shower facilities • Abundant parking
Amador Recreation Center	5	0.2	• Picnic tables • Fire pits • Ping pong tables • Event space • Kitchen space for events
Veterans Memorial Building	5	0.84	• Events Center • Stage • Kitchen Space
Senior Center Main Hall	5	0.28	• Events Center • Stage • Kitchen Space

The closest designated open spaces to the project site are the Martin Canyon Creek Trail, located approximately 0.88 mile northeast of the project site, and Dougherty Hills Open Space, located approximately 2.70 miles northeast, both of which are in the City of Dublin.

Project Site

There are no existing City parks, recreational facilities, or designated open spaces on the project site.

3.13.3 - Regulatory Framework

Federal

No federal plans, policies, regulations, or laws related to recreation are applicable to the proposed project.

State

Quimby Act

The Quimby Act (California Government Code § 66477) was established by the California Legislature in 1965 to preserve open space and parkland in rapidly urbanizing areas of the State. The Quimby Act allows cities and counties to establish requirements for new development to dedicate land for parks, pay an in lieu fee, or provide a combination of the two.

The Quimby Act provides two standards for the dedication of land for use as parkland. If the existing area of parkland in a community is greater than 3 acres per 1,000 residents, then the community may require dedication based on a standard of up to 5 acres per 1,000 persons residing in the subdivision based on the current ratio of parkland per 1,000 residents. If the existing amount of parkland in a community is less than 3 acres per 1,000 residents, then the community may require dedication based on a standard of only 3 acres per 1,000 persons residing in the subdivision.

The Quimby Act requires a city or county to adopt standards for recreational facilities in its general plan to adopt a parkland dedication or fee ordinance. The Pleasanton General Plan requires developers to dedicate public trail easements.[11]

It should be noted that the Quimby Act applies only to the acquisition of new parkland; it does not apply to the physical development of new park facilities or associated operations and maintenance costs. Therefore, the Quimby Act effectively preserves open space needed to develop park and recreation facilities, but it does not ensure the development of the land or the provision of park and recreation services to residents. In addition, the Quimby Act applies only to residential subdivisions. Nonresidential projects could contribute to the demand for park and recreation facilities without providing land or funding for such facilities. Quimby Act fees are collected by the local agency (park district, city, or county) in which the new residential development is located.

Local

City of Pleasanton General Plan

The Pleasanton General Plan establishes the following goals, policies, and programs associated with parks and recreation that are relevant to the proposed project:

Public Facilities and Community Programs Element

Goal 1 Provide sufficient public facilities and community programs to efficiently serve existing and future development while preserving and enhancing the quality of life for existing and future residents.

[11] City of Pleasanton. 2019. General Plan 2005–2025. August 20.

Goal 6 Achieve a complete park and recreation system featuring a wide variety of opportunities to serve the public need.

Policy 10 Provide sufficient parkland and recreational activities to accommodate existing and future needs of residents, workers, and visitors.

Program 10.2 Encourage developers to dedicate public park acreage in areas designated for park use on the General Plan Map rather than contribute in lieu fees.

Program 10.5 Develop neighborhood, community, and regional parks in accordance with the General-Plan goals and the land-use diagram.

Program 10.7 Provide community parks with adequate parking facilities to the greatest extent possible.

Program 10.8 Locate parks within one-half mile of the residential area they serve. To the greatest extent possible, such parks should not be separated from the neighborhood they serve by major arterials, commercial centers, and topographical or other features which create a direct or perceived physical barrier to the park.

Program 10.18 Maintain at least the standard of 5 acres of neighborhood or community parks per 1,000 people.

Program 10.22 Provide trails, bike routes or pedestrian walkways to connect the parks and recreational facilities throughout Pleasanton.

Conservation and Open Space Element

Goal 5 Preserve and protect existing and proposed open space lands for public health and safety, recreational opportunities, natural resources (e.g., agriculture, sand and gravel mining), sensitive viewsheds, and biological resources.

Policy 6 Protect all large continuous areas of open space, as designated on the General Plan Map, from intrusion by urban development. *(Measure QQ, Nov. 2008)*

Program 6.1 Explore working with the Tri-Valley Conservancy or similar entities to use transfer of development rights and conservation easements to preserve open space.

Program 6.3 Preserve large blocks of open space land by encouraging the clustering of development.

Program 6.4 Investigate methods and pursue opportunities to retain areas designated on the General Plan Map as Open Space for permanent open space use through acquisition, conservation easements, establishment of land trusts, etc.

Goal 6 Achieve an extensive open space system featuring a wide variety of opportunities to serve the diverse needs of the public.

Policy 7 Preserve and expand open space opportunities, including open space access to the public.

Program 7.1 Support expansion of the East Bay Regional Park District's Pleasanton Ridge Park in areas designated as Open Space.

Program 7.3 Encourage public accessibility to appropriate public open space land or in private open space land that could accommodate public access open space trails.

Program 7.4 Provide adequate parking and staging areas for open space access and include facilities such as picnic areas, restrooms, and potable water.

Policy 8 Preserve as permanent open space all areas of outstanding scenic qualities or areas which provide extraordinary views of natural and human-made objects.

Program 8.2 Retain the scenic attributes of existing (I-680) and proposed scenic highways (I-580 and State Route 84) including views of woodlands, hills and ridges, valleys, and grazing lands.

Program 8.4 Encourage developers to work with entities such as the Tri-Valley Conservancy to dedicate scenic/conservation easements for private open space areas possessing exceptional natural, scenic, and/or vegetation or wildlife habitat qualities.

Goal 7 Promote expansion and maintenance of a trail system that serves Pleasanton's diverse population while respecting and protecting the integrity of its natural and cultural resources.

Policy 9 Promote the development of a comprehensive system of pedestrian, bicycle, equestrian, and hiking trails throughout open space lands, including arroyos and canals, in the Planning Area.

Program 9.2 Require developers to dedicate public access easements for trails in private open space areas, where feasible.

Program 9.3 Continue to coordinate with Livermore, Dublin, Sunol, and the East Bay Regional Park District to develop trails linking recreation and open space areas.

Program 9.7 Protect, improve, develop, and maintain recreation and open space trails and their related facilities.

Program 9.8 Encourage the East Bay Regional Park District to provide public access to its Pleasanton Ridge Park from as many points as feasible, including Foothill Road, Palomares Road, and Dublin Canyon Road in order to maximize public access and to distribute the traffic impacts of staging areas.

Program 9.9 Wherever feasible, require new development within or adjacent to the Pleasanton Ridgeland's area to provide public access and/or public staging areas to connect with the Pleasanton Ridge Park.

Program 10.3 Consider providing and maintaining public restrooms, drinking fountains, benches, trash receptacles, and other amenities at trailheads including those along the arroyos and canals.

3.13.4 - Methodology

FirstCarbon Solutions (FCS) reviewed information about parks and recreation providers in and near the project site, Alameda County, and the City of Pleasanton. The General Plan, the City website, and the EBRPD website were reviewed for relevant information.

3.13.5 - Thresholds of Significance

Recreation

The Lead Agency utilizes the criteria in the California Environmental Quality Act (CEQA) Guidelines Appendix G Environmental Checklist to establish thresholds of significance to determine whether impacts to recreation are significant environmental effects. As such, the City has determined that the proposed project would have a potential impact if it would:

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

b) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.

3.13.6 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the development of the proposed project and provides mitigation measures where appropriate.

Increase Use of Parks

Impact REC-1:	**The proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.**

Impact Analysis

Construction

Project construction activities would not physically affect existing public parks and recreational facilities as no such facilities are located on or directly adjacent to the project site. Given the general accessibility of the project site and the availability of construction workers in the San Francisco Bay Area, it is unlikely that a substantial number of construction workers would relocate to the project area and increase the use of existing neighborhood parks. Furthermore, construction workers would have limited opportunities during the workday to use local parks and recreational facilities. Given

that the nearest park is located approximately 0.93 mile from the project site, it is unlikely that the construction of the proposed project would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

Operation

The DPR, EBRPD, and cities in the project vicinity maintain State, regional, and city parks, trails, and recreational facilities for public use. The Pleasanton General Plan establishes park standards. Specifically, Program 10.18 establishes standards to achieve a level of park facilities equal to 5 acres per 1,000 population, or 0.005-acre per person.[12] The proposed 28 net new single-family homes could be expected to increase population by approximately 74 people.[13,14] The proposed project would need to provide 0.37-acre of parklands to meet the City's standard of 0.005-acre of park facilities per person.[15]

The City's park system includes 46 community and neighborhood parks, approximately 60 miles of trails, and over 700 acres of undeveloped open space.[16] The Parks Maintenance Division maintains over 385 developed acres of parkland and 832 acres of open space parkland for a total of 1,217 acres.[17] The City had an estimated population of 74,653 as of July 1, 2023.[18] Therefore, the City is providing approximately 16.3 acres of parkland per 1,000 residents. As a result, the City is fulfilling its acres of parkland to population goal. Even with the increase of 74 residents generated by the proposed project, the City would still meet its goal of 5 acres of parkland per 1,000 residents.

Furthermore, the proposed project would permanently preserve 117.10 acres of open space. Four types of open space would be preserved, including Parcel A, 39.9 acres of open space owned by the Home Owners Association (HOA); Parcel B, 69.3 acres of EBRPD open space and access road (inclusive of staging area site); Parcel C, 7.6 acres of privately owned open space; and Parcel D, where 0.3-acre are reserved for a stormwater treatment basin. Also, a gated, public staging area providing access to EBRPD lands with 16 parking stalls, four trailer parking stalls, and trail connections to Pleasanton Ridge would be constructed as part of the proposed project. The 39.9 acres of HOA open space alone would more than satisfy the City's standard of 0.37-acre for the anticipated population growth created by the proposed project.

Given the wide range of recreational opportunities provided as part of the proposed project, the recreational needs of the anticipated 74 residents would be met by the proposed project and would not result in increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

[12] City of Pleasanton. 2019. General Plan 2005-2025. August 20.
[13] California Department of Finance (CDF). 2025. E-5 City/County Population and Housing Estimates. Website: https://dof.ca.gov/forecasting/demographics/estimates/. Accessed February 24, 2025.
[14] Pleasanton's Persons per household rate was 2.62. 2.62*28=73.36.
[15] 74 persons times 0.005-acre per person equals 0.37-acre.
[16] City of Pleasanton. 2025. City Parks. Website: https://www.cityofpleasantonca.gov/gov/depts/cs/parks/default.asp. Accessed February 24, 2025.
[17] City of Pleasanton. 2025. Parks Maintenance. Website: https://www.cityofpleasantonca.gov/gov/depts/os/parks/default.asp. Accessed February 24, 2025.
[18] United States Census Bureau. 2024. QuickFacts: Pleasanton city, California. Website: https://www.census.gov/quickfacts/fact/table/pleasantoncitycalifornia/PST045222.Accessed February 24, 2025.

Therefore, impacts related to potential increased use and physical deterioration of existing parks and recreational facilities would be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

Level of Significance After Mitigation

Less than significant impact.

Mitigation Measures

None.

Recreational Facilities Physical Effect on Environment

Impact REC-2:	**The proposed project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.**

Impact Analysis

Construction

The proposed project would include a staging area and a trail connection to EBRPD Pleasanton Ridge Regional Park. (Exhibit 2-7d) The staging area would consist of a parking lot with trailer stalls, a drinking fountain and horse trough, and a vault restroom. The environmental impacts associated with implementation of the staging area are accounted for in the general discussion of project construction in the Air Quality, GHG Emissions, Noise, and Transportation sections within this Draft EIR. The summary of those impacts are:

- Noise: limited by following standard construction practices and noise ordinances of Pleasanton, such as no construction on Sundays or holidays.
- Air Quality/GHG: limited by following standard construction best management practices.
- Transportation: limited by following standard construction best management practices.

The proposed project's construction of a staging area on the project site would result in a less than significant impact in terms of resulting in an adverse physical impact on the environment.

Operation

Given the wide range of recreational opportunities available provided as part of the proposed project, the recreational needs of the proposed project's anticipated 74 residents would be met by the proposed project and would not result in increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. The environmental impacts associated with implementation of these

amenities is accounted for in the discussion of air quality, GHG emissions, noise, and transportation-related impacts within this Draft EIR.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

3.13.7 - Cumulative Impacts

Increased Park Use

There are 17 residential applications at various stages of approval and construction, as of February 2025, for the City of Pleasanton. The combined proposed increase of residential units associated with this development is 1,503. Applying the 2024 resident per household rate for the City of Pleasanton results in a possible increase of 3,938 people.[19]

Program 10.18 establishes standards to achieve a level of park facilities equal to 5 acres per 1,000 population, or 0.005-acre per person. This cumulative effect of population growth would require 7.515 acres of parklands. However, as stated above, the City currently provides approximately 16.3 acres per 1,000 residents based on a population of 74,653. With the addition of population growth of the cumulative projects, the projected population would be 78,591. Dividing that with the total 1,217 acres of parkland would result in a 15.49 acres per 1,000 residents or 0.15-acre per person.

This is still well above the City goal of 0.005-acre per person, and while the increase in population will increase the use of parks, it is well below their maximum capacity ability. The cumulative impact would be less than significant.

Moreover, the proposed project would not have a cumulatively considerable contribution to this less than significant impact because the proposed project includes significant open space that exceeds the City's standard for parkland per resident.

Recreational Facilities Provision

As discussed above, the City currently exceeds its goal for recreational facilities. Accordingly, there is no cumulative impact that requires the construction of recreational facilities. Additionally, all development projects in the City would be required to adhere to standard construction best management practices. Accordingly, cumulative impacts associated with the development of recreational facilities would be less than significant. Additionally, the proposed project would not have a cumulatively considerable contribution to the less than significant impacts. The proposed project would include a staging area and a trail connection to EBRPD Pleasanton Ridge Regional Park, which would increase the amount of available recreational facilities and increase ease of access to recreational options for all residents of Pleasanton.

[19] California Department of Finance (CDF). 2025. E-5 City/County Population and Housing Estimates. Website: https://dof.ca.gov/forecasting/demographics/estimates/. Accessed February 24, 2025.

There are 385 acres of developed park that include recreational facilities listed above, which would result in 0.0049-acre per person for the projected population of 78,591. This does not take into account any private or business recreational facilities in the City that would absorb some of the impact nor any possible recreational facilities proposed in the cumulative projects above.

When combined with the available park and open space above, this would spread the concentration of residents to limit the impact on individual recreational facilities. The cumulative impact would be less than significant.

Level of Cumulative Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

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3.14 - Transportation

3.14.1 - Introduction

This section describes existing conditions related to transportation in the project area as well as the relevant regulatory framework. This section also evaluates the possible impacts related to transportation that could result from implementation of the proposed project. Information in this section is based on the project-specific Transportation Impact Study (TIS), prepared by TJKM and included in this Environmental Impact Report (EIR) as Appendix H. Thirteen public comments were received during the EIR scoping period related to transportation:

- Request to build a sidewalk along Dublin Canyon Road for pedestrian safety.
- Request to lower the speed limit on Dublin Canyon Road.
- Concerns regarding traffic safety at the Dublin Canyon Road and Canyon Meadows Drive intersection.
- Request for the installation of a stoplight or stop sign at the Dublin Canyon Road and Canyon Meadows Drive intersection.
- Concerns regarding uninterrupted access to the Oak Hills Congregational Church's property during and after construction.
- Concerns regarding congestion and traffic safety on their property in the project area.
- Request to analyze impacts related to the existing emergency fire road, ensuring that it is maintained and available for emergency use.
- Concerns related to traffic safety on Dublin Canyon Road.
- Concern related to traffic and traffic safety on Dublin Canyon Road.
- Suggestion that a traffic light be installed on Dublin Canyon Road.
- Request that a bike lane be installed along Dublin Canyon Road.
- Concerns about which bridges would be widened and not having a left turn lane for the Canyon Meadows neighborhood, although there is a right-hand lane being proposed.

3.14.2 - Environmental Setting

This section describes the existing transportation conditions in the study area, including the roadway network and transit, pedestrian, and bicycle facilities in the vicinity of the project site.

Roadway Facilities

The project area is located just south of Interstate 580 (I-580) and on the west side of I-680, with regional access to the site provided from an interchange with I-580 at Foothill Road. Dublin Canyon Road provides local access. These roadways, as well as other key roadways in the study area, are described below.

Regional

Interstate 580

I-580 is an east–west, eight-lane freeway with four mixed-flow lanes in each direction in the vicinity of the project site. I-580 is located to the north of the project site and provides regional freeway access connecting I-5 with the San Francisco-Oakland Bay Bridge and further northwest through the City of Richmond. I-580 provides direct access to Dublin, Pleasanton, and Livermore. Near the project site, I-580 is oriented in an east–west direction. The nearest access from I-580 to the project site is provided via on and off ramps at Foothill Boulevard.[1]

Interstate 680

I-680 a north–south, six-lane freeway with three mixed-flow lanes in each direction to the south of I-580 and an eight-lane freeway with four mixed-flow lanes in each direction to the north of I-580 in the vicinity of the project site. I-680 is located to the east of the project site and provides regional freeway access north to San Ramon, Walnut Creek, and Concord and south to Milpitas and San José. Access from I-680 to the project site is provided via interchanges at I-580 and Stoneridge Drive.[2]

Local

Arterials

Foothill Road

Foothill Road is a two- to five-lane arterial street extending between Dublin and I-580 to the north and Sunol to the south of Pleasanton. Foothill Boulevard is a five- to six- lane roadway in the vicinity of the project site and provides connection with Stoneridge Drive. The roadway lies on the east of the project site and provides access from I-580, I-680, Stoneridge Drive, and San Ramon Road. Sidewalks and bicycle lanes are provided on both sides of Foothill Boulevard south of the intersection with Dublin Canyon Road.

Stoneridge Drive

Stoneridge Drive is a four- to six-lane east–west arterial street extending between Foothill Boulevard and Laurel Creek Drive in the west, through the Hacienda Business Park, to El Charon Road on the eastern border of Pleasanton with Livermore. Sidewalks and bicycle lanes are provided on both sides of Stoneridge Drive.

Dublin Canyon Road

Dublin Canyon Road is a two-lane east–west roadway parallel to I-580 that extends between Foothill Boulevard to the east and Palo Verde Road, about 5 miles from the western boundary of Pleasanton, where it becomes Castro Valley Boulevard. Bicycle lanes are provided on most segments of Dublin Canyon Road near the project site and on-street parking is prohibited. No sidewalks are provided on the segment of Dublin Canyon Road bordering the site. Dublin Canyon Road is frequently used as an alternate route by motorists to avoid peak period congestion on I-580, primarily westbound on weekday mornings and eastbound on weekday afternoons, and carries roughly 800 AM and 1,000 PM peak-hour vehicle trips near the project site. Dublin Canyon Road is designated as an arterial

[1] City of Pleasanton. 2019. Pleasanton General Plan 2005–2025: Circulation Element. Website: https://www.cityofpleasantonca.gov/assets/our-government/community-development/3.%20Circulation%20Element%20(SA).pdf. Accessed January 11, 2024.

[2] Ibid.

street from Foothill Boulevard to 600 feet west of Canyon Creek Circle, including the segment bordering the project site. Dublin Canyon Road borders the north edge of the project site and connects the project site with other streets in the area including Foothill Boulevard, Laurel Creek Road, Canyon Meadows Drive, Canyon Creek Circle, and Schaefer Ranch Road. The speed limit on Dublin Canyon Road is 55 miles per hour (mph) to the west of the project site. The speed limit changes to 45 mph near the proposed intersection with Street B, where a sign indicting the 45 mph speed limit is accompanied by a radar feedback display that displays the speeds of eastbound motorists.

Residential Collector

Laurel Creek Road

Laurel Creek Road is a two-lane residential collector extending between Dublin Canyon Road to the west and Foothill Boulevard on the east. The roadway provides lies to the east of the project site and provides access to residential properties and connects with Foothill Boulevard and Stoneridge Drive. Right turn access from westbound Dublin Canyon Road is restricted in order to discourage cut-through traffic.

Canyon Meadows Drive

Canyon Meadows Drive is a local street on the north side of Dublin Canyon Road, approximately 500 feet west of the proposed East Bay Regional Park District (EBRPD) driveway that provides access to an adjacent residential development that serves 83 AM and 82 PM peak-hour vehicle trips based on recent counts (including 69 outbound during the AM peak-hour, and 31 outbound during the PM peak-hour). Sidewalks are provided on both sides of Canyon Meadows Drive up to the intersection with Dublin Canyon Road.

Canyon Creek Circle

Canyon Creek Circle is a local street on the north side of Dublin Canyon Road, approximately 300 feet east of the proposed Street B that provides access to approximately 40 residences and is estimated to serve less than 40 vehicle trips during both the AM and PM peak-hours. Sidewalks are provided on both sides of Canyon Creek Circle up to the intersection with Dublin Canyon Road.

Roadway

Schaefer Ranch Road

Schaefer Ranch Road is a two-lane roadway that lies about 2 miles from the western City boundary and connects the Schaefer Ranch residential development and Dublin Boulevard, both located on the north side of I-580, to the project site via Dublin Canyon Road. The roadway lies to the west of the project site.

Existing Pedestrian Facilities

There are no existing sidewalks on Dublin Canyon Road in the immediate vicinity of the project site. Sidewalks are provided on segments of Dublin Boulevard to the west and east of the project site but do not connect to the project site. Two intersections closest to the project site have internal sidewalks extending toward residences on Canyon Creek Circle and Canyon Meadows Drive. The intersection of Schaefer Ranch Road and Dublin Canyon Road, a side-street stop-controlled intersection, is equipped with sidewalks. Other study intersections lying to the east of the project

site are signalized and are well equipped with marked crosswalks, push buttons, and pedestrian countdown heads. There is a provision of pedestrian crossing signage and ladder crosswalks in locations where there are no existing push buttons and countdown heads.

Existing Bicycle Facilities

The 2018 City of Pleasanton Bicycle and Pedestrian Master Plan describes the following classes of bicycle infrastructure described below:

- Class I Bikeways/Multiuse Paths: Class I bikeways are also referred to as multiuse or shared use paths. They provide completely separated, exclusive right-of-way for people to walk and bike. There are 13 miles of Class I bikeways in Pleasanton, which include the Iron Horse Trail, Centennial Trail, Arroyo Mocho Trail, Pleasanton Canal Trail, and Marilyn Murphy Kane Trail.
- Class II Bikeways/On-street Bike Lanes: Class II bikeways provide restricted right-of-way and are designated for the use of bicycles with a striped lane on a street or highway. These lanes are at least 5 feet wide. The path of travel on bike lanes can be highlighted with green paint at locations of conflict zones. There are approximately 40 miles of Class II bike lanes existing in the City.
- Class III Bikeways/Bike Routes: Class III bikeways are signed bike routes where bicyclists share a travel lane with motorists. Marked with sharrows, bike routes often exist where there is on-street parking to encourage cyclists to ride a safe distance away from parked vehicles' "door zone." Sharrows also inform drivers that cyclists should be expected on the street and given sufficient room. There are approximately 7 miles of bicycle routes in the City.
- Class III Bikeways/Bicycle Boulevards: These are similar to bicycle routes, where bicyclists and drivers share the travel lane. However, bicycle boulevards must be located on residential streets with low auto volume and low speeds. They typically include traffic calming measures to create safe, comfortable streets, together with enhanced signage and pavement markings. There are currently no bicycle boulevards existing in the City.
- Class IV Bikeways/Protected On-street Bike Lane/Cycletracks: Class IV bikeways are bicycle lanes that are fully protected from auto traffic through raised elements, such as curbs, plastic bollard, landscaping, or parking. They are a key element of the all-ages-and-abilities network due to their comfort and safety benefits. They are also known as protected bike lanes or cycle tracks. There are currently no separated bikeways in the City.

The project site is well connected to adjacent areas with Class II bike lanes installed throughout Dublin Canyon Road connecting to Foothill Boulevard. Foothill Boulevard and Stoneridge Drive in the vicinity of the project site are also equipped with Class II bike lanes. However, there are no bike lanes within the streets east of Foothill Road that provides access to the Stoneridge Shopping Mall and West Dublin/Pleasanton Bay Area Rapid Transit (BART) Station. The project site is located roughly 1.4 miles from the West Dublin/Pleasanton BART station, within convenient cycling distance.

Public Transit

Livermore Amador Valley Transit Authority (LAVTA), Pleasanton Paratransit, Central Contra Costa Transit Authority (CCCTA), BART, and Altamont Commuter Express (ACE) provide transit service in the area.

BART provides regional transportation connections to much of the Bay Area. The Dublin/Pleasanton line provides direct access to San Francisco, with several stops in Oakland where connections may be made to other lines. BART train frequency ranges between 15–20 minutes from approximately 5:00 a.m. to 1:30 a.m. On an average weekday in December 2024, approximately 2,750 passengers per day entered and 2,701 exited the BART system at the Dublin/Pleasanton Station, and approximately 1,147 passengers entered and 1,171 exited at the West Dublin/Pleasanton Station.[3]

ACE operates weekday train service between Stockton and San José, with a stop in Downtown Pleasanton. Westbound service is provided from the Central Valley to San José during the morning commute period only, while eastbound service is provided only in the afternoon/evening commute period. There are four morning trains through Pleasanton between 5:23 a.m. and 8:48 a.m., and four evening trains between 3:08 p.m. and 6:28 p.m. Travel time from Stockton to Pleasanton is approximately 1 hour and 15 minutes, while travel time from Pleasanton to San José is approximately 1 hour.[4] The Pleasanton ACE Station is located approximately 4.58 miles southeast of the project site.

CCCTA operates County Connection buses, providing transit service connecting destinations in Contra Costa County to the Tri-Valley area, including service from the Dublin/ Pleasanton BART Station to the San Ramon Transit Center and Bishop Ranch Business Park. One route also connects the Walnut Creek BART Station to the Pleasanton ACE Station.

LAVTA operates Wheels, a fixed-route and paratransit service serving the Cities of Dublin, Pleasanton, and Livermore that also provides connections to other transit services. Wheels buses connect downtown areas, employment centers, and destinations such as the Hacienda Business Park, Bernal Corporate Park, Stoneridge Mall, and transit hubs, including BART and ACE Stations. Wheels bus schedules are also coordinated with ACE and BART trains during peak commute hours. Routes 3 and 53 provide the closest service to the project site. Both operate from Stoneridge Mall located 1.22 miles east of the project site, with Route 3 traveling along Stoneridge Drive to the Dublin/ Pleasanton BART Station and Route 53 traveling along I-680 to the Pleasanton ACE Station. Route 3 provides service to the Stoneridge Mall and Hacienda areas, and both Dublin/Pleasanton BART Stations, operating every 40 minutes during the day and 60 minutes at night.[5] Route 53 only makes stops at the Stoneridge Mall area and the Pleasanton ACE Station, operating approximately every hour, including waiting approximately 25 minutes at the ACE Station between runs.[6] There are

[3] San Francisco Bay Area Rapid Transit District. 2024. 2024 Monthly Ridership Reports. Website: https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.bart.gov%2Fsites%2Fdefault%2Ffiles%2F2025-01%2FRidership_202412.xlsx&wdOrigin=BROWSELINK. Accessed January 28, 2025.

[4] San Joaquin Regional Rail Commission. 2025. Schedules. Website: https://acerail.com/schedules/. Accessed September 18, 2025.

[5] Livermore Amador Valley Transit Authority. 2025. Route 3. Website: https://www.wheelsbus.com/routes/route-3/. Accessed January 28, 2025

[6] Livermore Amador Valley Transit Authority (LVTA). 2025. Route 53. Website: https://www.wheelsbus.com/routes/route-53/. Accessed September 18, 2025.

also Wheels School Routes, the closest services to the project site being Routes 603 and 604, with pickups approximately 1.56 miles east and continuing along Springdale Avenue and drop offs at Hart Middle School and Foothill High School, respectively.[7] School Routes generally operate once in the morning and once in the afternoon.[8]

Continuous pedestrian connections are not provided to transit stops from the project site, and the closest transit stop is approximately 1.3 miles from the project site; therefore, it is expected that any future residents who would use transit would drive to transit stations.

3.14.3 - Regulatory Framework

Federal

No federal plans, policies, regulations, or laws related to transportation and traffic are applicable to the proposed project.

State

Senate Bill 743

In November 2017, the Office of Land Use and Climate Innovation (LCI) released a technical advisory containing recommendations regarding the assessment of Vehicle Miles Traveled (VMT), proposed thresholds of significance, and potential mitigation measures for lead agencies to use while implementing the required changes contained in Senate Bill (SB) 743. Also in November 2017, LCI released the proposed text for Section 15064.3, "Determining the Significance of Transportation Impacts," which summarized the criteria for analyzing transportation impacts for land use projects and transportation projects and directed lead agencies to "choose the most appropriate methodology to evaluate a project's VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure." State guidance recommends that, for most instances, a per service population threshold should be adopted and a 15 percent reduction below that of existing development would be a reasonable threshold.

As noted in the Guidelines, agencies are directed to choose metrics that are appropriate for their jurisdiction to evaluate the potential impacts of a project in terms of VMT. The current deadline for adopting policies to implement SB 743 is July 2020; the change to VMT was formally adopted as part of updates to the California Environmental Quality Act (CEQA) Guidelines in December 2018. Contra Costa County has not yet established specific local VMT thresholds.

The updated guidelines eliminate the use of automobile delay metrics, such as Level of Service (LOS), from determining significant environmental impacts from vehicle travel. VMT has been identified as the most appropriate metric to evaluate a project's transportation impacts, as projects that result in lower than average VMT support goals of reducing greenhouse gas emissions, while projects that result in higher than average levels of vehicle travel contribute to an increasing rate of greenhouse gas (GHG) emissions.

[7] Livermore Amador Valley Transit Authority (LVTA). 2025. School Routes. Website: https://www.wheelsbus.com/routes-and-schedules/. Accessed September 18, 2025.
[8] Livermore Amador Valley Transit Authority (LVTA). 2025. Route 604. Website: https://www.wheelsbus.com/routes/route-604/. Accessed September 18, 2025.

Projects that are within 0.5 mile of an existing major transit stop, which is define as a rail transit station, ferry terminal served by bus or rail transit, or the intersection of two or more major bus routes with service frequencies of 15 minutes or less during the morning and afternoon peak commute periods, are presumed to be less than significant if the project has the following characteristics:

- Has a floor area ratio (FAR) greater than 0.75.
- Does not include more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking).
- Is consistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization).
- Does not replace affordable residential units with a smaller number of moderate or high-income residential units.

If a project meets the screening requirements, it is presumed to have a less than significant impact related to VMT.

Since there are no standards in effect on VMT analysis, a preliminary assessment of the VMT generated by the proposed project was prepared for informational and disclosure purposes only. No determination on the significance of VMT impacts is made in this document since none is legally required.

Regional

Plan Bay Area

Plan Bay Area 2050 is a long-range integrated transportation and land use/housing strategy through 2050 for the San Francisco Bay Area. On October 21, 2021, the Association of Bay Area Governments (ABAG) Executive Board and the Metropolitan Transportation Commission (MTC) jointly approved the plan. Plan Bay Area 2050 connects the elements of housing, the economy, transportation, and the environment through 35 strategies that will make the Bay Area more equitable for all residents and more resilient in the face of unexpected challenges. In the short-term, the plan's Implementation Plan identifies more than 80 specific actions for MTC, ABAG, and partner organizations to take over the next 5 years to make headway on each of the 35 strategies. Plan Bay Area is the nine-county region's long-range plan designed to meet the requirements of SB 375.

Metropolitan Transportation Commission

The majority of federal, State, and local financing available for transportation projects is allocated at the regional level by MTC, the transportation planning, coordinating, and financing agency for the nine-county Bay Area.

Alameda County Transportation Commission

The Alameda County Transportation Commission (Alameda CTC) is a joint powers authority governed by a 22-member commission that comprises elected offices from each of the 14 cities in Alameda County; the Alameda County Board of Supervisors; and elected representatives for Alameda County

Transit and BART. The Alameda CTC coordinates countywide transportation planning efforts and delivers projects and programs.

Alameda CTC also serves as the County's congestion management agency. The Alameda CTC administers a Land Use Analysis Program, which is one of the legislatively required elements of the Alameda CTC Congestion Management Program. Alameda CTC reviews local land use plans and projects with the potential to cause countywide or regional impacts. The purpose of the Alameda CTC's review is to assess impacts of individual development actions on the regional transportation system and ensure that significant impacts are appropriately mitigated.

Alameda CTC guidelines state that impacts on all modes of transit should be considered, as follows:

- Transit: Effects of vehicle traffic on mixed-flow transit operations, transit capacity, transit access/egress, the need for future transit service, consistency with adopted plans, and circulation element needs.
- Bicycles: Effects of vehicle traffic on bicyclist conditions, site development and roadway improvements, and consistency with adopted plans.
- Pedestrians: Effects of vehicle traffic on pedestrian conditions, site development and roadway improvements, and consistency with adopted plans.
- Other Impacts and Opportunities: Noise impacts for projects near State highway facilities and opportunities to clear access improvements environmentally for transit-oriented development projects.

Alameda CTC Countywide Transportation Plan

The Countywide Transportation Plan (CTP) establishes near-term priorities and guides long-term decision-making for the Alameda CTC. It establishes a vision for the County's complex transportation system that supports vibrant and livable communities. The CTP is updated every 4 years and serves as a key input into the region's transportation plan, Plan Bay Area 2050. The current CTP covers transportation projects, policies, and programs out to the year 2050 for Alameda County.

The CTP includes two companion documents:

- Community-based Transportation Plan: An assessment of transportation needs in the County's low-income communities and communities of color with a focus on input collected via community engagement activities.
- New Mobility Roadmap: A document that provides a foundation for agency policy, advocacy, and funding decisions to advance new mobility technologies and services for the Alameda CTC and partner agencies as well as the private sector. The outcome of the New Mobility Roadmap is a set of seven initiatives, each of which has a comprehensive list of potential actions that could be taken to address and implement new mobility technologies and services in Alameda County.

Priority projects and programs to be prioritized over the next 10 years are identified under the CTP. This list includes seven projects located in the City:

- I-680 Express Lanes: State Route (SR) 84 to Alcosta (Phase 1–Southbound)
- I-580/I-680 Interchange (Phase 1)
- Dublin-Pleasanton BART Station Active Access Improvements
- I-580/Fallon/El Charro Interchange Modernization (Phase 2)
- Iron Horse Trail Improvements
- I-680 Sunol Interchange Modernization
- West Las Positas Bike Corridor Improvements

Local

City of Pleasanton General Plan

The Pleasanton General Plan establishes the following goals, policies, and programs associated with transportation that are relevant to the proposed project:

Land Use Element

Goal 2 Achieve and maintain a complete well-rounded community of desirable neighborhoods, a strong employment base, and a variety of community facilities.

Policy 4 Allow development consistent with the General Plan Land Use Map.

Policy 9 Develop new housing in infill and peripheral areas which are adjacent to existing residential development, near transportation hubs or local-serving commercial areas.

Goal 3 Develop a safe, convenient, and uncongested circulation system.

Policy 22 Regulate the number of housing units approved each year to adequately plan for infrastructure and assure City residents of a predictable growth rate.

Circulation Element

Goal 1 Develop a safe, convenient, and uncongested circulation system.

Policy 1 Complete the City's street and highway system in accordance with the General Plan Map.

Policy 2 Phase development and roadway improvements so that levels of service at adjacent major intersections do not exceed LOS D at major intersections outside Downtown and gateway intersections.

Policy 3 Facilitate the free flow of vehicular traffic on major arterials.

Policy 4 In the Downtown, facilitate the flow of traffic and access to Downtown businesses and activities consistent with maintaining a pedestrian-friendly environment.

Goal 4 Provide a multimodal transportation system which creates alternatives to the single-occupancy automobile.

Policy 13 Phase transit improvements to meet the demand for existing and future development.

Policy 22 Create and maintain a safe, convenient, and effective bicycle system which encourages increased bicycle use.

Policy 23 Create and maintain a safe and convenient pedestrian system which encourages walking as an alternative to driving.

3.14.4 - Methodology

The proposed project's traffic impacts are forecasted using a three-step process.

- Trip Generation–Forecasts the amount of traffic added to the roadway network
- Trip Distribution–Predicts the direction of travel to and from the project site
- Trip Assignment–The new vehicle trips are assigned to specific street segments and intersection turning movements

Project Vehicle Trip Generation

TJKM developed estimated project trip generation for the proposed project based on published trip generation rates from the Institute of Transportation Engineers (ITE) publication Trip Generation (10th Edition*).* TJKM used published trip rates for the ITE land use Single-family Detached Housing (ITE Code 210). The 10th Edition does not provide vehicle trip rates for attached single-family housing. Published trip rates from land use of Public Park (ITE Code 411) was utilized to obtain projects trips for the proposed 69.3 acre park.

Table 3.14-1 shows the trip generation expected by the proposed 29 new single-family residences and 70-acre park space. The two single-family residential units being replaced would not be expected to contribute to a net increase in traffic. The proposed project is expected to generate approximately 407 daily vehicle trips including 22 weekday AM peak-hour trips (six inbound and 16 outbound) and 56 weekday PM peak-hour trips (33 inbound and 23 outbound).

Table 3.14-1: Project Vehicle Trip Generation Forecast

Land Use	ITE Code	Size	Weekday		AM Peak-hour					PM Peak-hour				
			Rate	Trips	Rate	In %	In	Out	Total	Rate	In %	In	Out	Total
Single-family Residential[1]	210	29 dwelling units	9.44	274	0.74	25	5	16	**21**	0.99	63	18	11	**29**
Park (proposed EBRPD Park-Parcel B)	411	70.3 acres	(2)	133[2]	0.02	59	1	0	**1**	(3)	55	15	12	**27**[3]

Land Use	ITE Code	Size	Weekday		AM Peak-hour					PM Peak-hour				
			Rate	Trips	Rate	In %	In	Out	Total	Rate	In %	In	Out	Total
Total Vehicle Trips			**407**				6	16	**22**			33	23	**56**

Notes:
[1] Land Use Code 210 (Single-family Detached) was used as ITE Trip Generation Manual 10th Edition does not provide a rate for Single-family Attached
[2] Average weekday vehicle trips for park based on fitted curve equation: (70.3 acres x 0.64) + 88.46 = 133 weekday vehicle trips.
[3] PM peak-hour vehicle trips for park based on fitted curve equation: (70.3 acres x 0.06) + 22.6 = 27 PM peak-hour vehicle trips.
Source: TJKM. 2025. Hidden Canyon Residences & Preserve Transportation Impact Study. July.

3.14.5 - Thresholds of Significance

The Lead Agency utilizes the criteria in CEQA Guidelines Appendix G Environmental Checklist to establish thresholds of significance to determine whether impacts to transportation are significant environmental effects. As such, the City has determined that the proposed project would have a potential impact if it would:

a) Conflict with a program plan, ordinance or policy of the circulation system, including transit, roadway, bicycle and pedestrian facilities.

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

d) Result in inadequate emergency access.

3.14.6 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the proposed project and provides mitigation measures where necessary.

Conflict with Program, Plan, Policy of the Circulation System Impact

TRANS-1:	**The proposed project would not conflict with a program plan, ordinance, or policy of the circulation system, including transit, roadway, bicycle, and pedestrian facilities.**

Impact Analysis

Pedestrian Facilities

Pedestrian circulation within the project site would be accommodated by 5-foot-wide sidewalks on both sides of the proposed Street B and along one side of proposed Street A. In addition, the proposed Emergency Vehicle Access (EVA) road would provide a direct connection for pedestrians between Street A and Dublin Canyon Road. The proposed project also includes the construction of a

5-foot-wide sidewalk along the front of Lot 30 along Dublin Canyon Road, along with a pedestrian crossing at Canyon Meadows Drive that would facilitate access to the proposed EBRPD trail head.

The proposed project is anticipated to improve walkability and would not interfere with pedestrian accessibility to the adjoining areas. The proposed project would not conflict with an existing or planned pedestrian facility; nor would the proposed project conflict with policies related to pedestrian travel adopted by the City of Pleasanton. Therefore, the impact to pedestrian facilities is considered less than significant.

Bicycle Facilities

Bicycle lanes are provided on Dublin Canyon Road adjacent to the project site. As shown on the project site plans: bicycle lanes would be provided adjacent to both of the proposed eastbound right turn lanes that would access the project site at Street B and the EBRPD Driveway. Bicycle access to the project site would be adequately accommodated by the proposed Street B and EBRPD Driveway, and by the proposed EVA road. The proposed project is not anticipated to interfere with bicycle accessibility to project site and adjoining areas; or conflict with an existing or planned pedestrian or bicycle facility; or conflict with policies related to bicycle and pedestrian activity adopted by the City of Pleasanton. Therefore, the impact to bicycle facilities would be less than significant.

Transit Facilities

No public transit service is provided on Dublin Canyon Road near the project site. The proposed project would not conflict with existing or planned transit services. The project is located within convenient bicycling distance from the West Dublin/Pleasanton BART Station located approximately 1.4 miles to the east. The proposed project is not anticipated to create significant demand for public transit services above the capacity that is provided or planned. The project would not conflict with transit policies adopted by the City of Pleasanton, Alameda County Transportation Commission (ACTC), Wheels (LAVTA), or BART for their respective facilities in the study area. Therefore, impacts to transit service would be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

Level of Significance Before Mitigation

Less than significant impact.

Conflict with CEQA Guidelines Section 15064.3, Subdivision (b)

Impact TRANS-2: The proposed project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

Impact Analysis

CEQA Guidelines Section 15064.3(b) requires that transportation impacts be evaluated based on VMT, which considers the amount and distance of automobile travel attributed to different types of

land use projects. According to these guidelines, the Lead Agency is responsible for selecting an appropriate methodology to assess a project's VMT impact.

While the City of Pleasanton has not formally adopted VMT thresholds or a specific methodology for evaluating VMT impacts, the City's Housing Element Draft EIR referenced the LCI approach for evaluating transportation impacts under CEQA. This methodology allows for a presumption of a less than significant impact if a development project meets certain screening criteria such as being located in a low-VMT area or near public transit which would exempt it from a detailed VMT analysis. The proposed project does not qualify for these screening criteria; therefore, a detailed VMT analysis was performed to determine the proposed project's potential for a significant VMT impact.

The analysis established a significance threshold for VMT, in line with LCI's recommendation that residential VMT per capita should remain 15 percent below Alameda County's average. The analysis used the ACTC Countywide Travel Demand Model, which evaluated the Traffic Analysis Zone (TAZ) containing the proposed project under both existing and future (2040 cumulative) conditions. The analysis found that the project would result in a VMT per capita of 34.83 under existing plus project conditions and 33.26 under cumulative conditions. Both values exceed the VMT per capita thresholds of 16.47 for baseline conditions and 15.0 for cumulative conditions. The proposed project would need to reduce its VMT by 54.91 percent to be considered less than significant.

The project site is included as a candidate housing site within the City's Housing Element EIR. The City's Housing Element EIR found that development of the sites would result in significant and unavoidable impacts related to VMT. However, MM TRANS-2 of the City's Housing Element EIR requires individual housing developments that do not screen out from VMT analysis, such as the proposed project, to incorporate feasible VMT reduction strategies if impacts exceed the VMT threshold. Accordingly, the proposed project would implement VMT reduction strategies recommended by the ACTC VMT Tool. Strategies, including the reduction of off-street parking spaces (subject to City approval) and enhancements to infrastructure supporting multimodal transportation (e.g., bicycle and pedestrian facilities), are available to reduce VMT. A full description of each strategy and associated VMT reduction potential is provided in Appendix H. Collectively, the strategies would only achieve a 14 percent reduction in VMT, which is insufficient to meet Alameda County's per capita threshold. This would be consistent with the conclusions of the certified Housing Element EIR, and no feasible mitigation measures exist to further reduce VMT.

Because the proposed project would continue to exceed the 15 percent below average residential VMT per capita threshold for Alameda County, it would result in a significant and unavoidable impact in terms of consistency with CEQA Guidelines Section 15064.3(b).

Level of Significance Before Mitigation

Significant and unavoidable impact.

Mitigation Measures

No feasible mitigation measures.

Level of Significance After Mitigation

Significant and unavoidable impact.

Hazards

Impact TRANS-3: The proposed project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Impact Analysis

The proposed main access, via Proposed Street B, is forecast to experience 21 AM. peak-hour vehicle trips and 29 PM peak-hour vehicle trips traveling to/from Lots 1 to 29. Most traffic travels to and from the east. The speed limit on Dublin Canyon Road changes at Street B: to the west the speed limit is 55 mph; to the east the limit is 45 mph. There is a 45 mph speed limit sign and radar feedback sign (giving eastbound motorists their speeds) at the site of the future street. Traffic approaching from the west is legally traveling 55 mph. For traffic exiting the site from this driveway, the safe stopping distance for eastbound traffic is 500 feet. (If the available sight distance exceeds the stopping sight distance, the approaching vehicle can safely stop before reaching the vehicle exiting the site.) The clear sight distance to the west is 700 feet, which is adequate. From the east, westbound traffic is in a 45 mph speed zone with a safe stopping distance of 360 feet. The available sight distance to the east is greater than 1,000 feet, which is adequate.

The design for this driveway includes a proposed short westbound left turn lane of about 75 feet to access the proposed Street B. A 75-foot transition buffer would be striped to the east between this turn lane and the existing left turn lane into Canyon Creek Circle. The design for this driveway is showcased on Figure 2b: Proposed Residential Entrance/Exit for Motor Vehicles, of the TIS in Appendix H. The dimensions of the existing eastbound left turn lane into Canyon Creek Circle are slightly greater than the proposed dimension for the main Hidden Canyon entrance. The two sequential left turn lanes serve more traffic for Hidden Canyon than Canyon Creek. However, because these will be painted lanes, traffic operations allow motorists some leeway in their travel paths. The TIS determined that these two intersections would be able to operate acceptably

The proposed EBRPD access roadway is also forecast to have 3 AM peak-hour vehicle trips and 27 PM peak-hour vehicle trips traveling to/from lots 1 to 29. Most project trips will be to and from the east. According to the TIS, the safe stopping distance here is 360 feet. Currently, to the west, the visibility is clear for over 450 feet; to the east it is over 700 feet. As such, both were determined to have adequate safe stopping distances. In addition, short painted turn lanes are proposed, including an eastbound right turn lane and a westbound left turn lane. The proposed right turn lane dimensions would be designed to be adequate for safe conditions. Further, there is an existing radar feedback sign for westbound traffic directly opposite the proposed EBRPD access, which would serve the access lanes for this intersection and would not conflict with the proposed design.

Additionally, bicycle lanes would be provided adjacent to both of the proposed eastbound right turn lanes that would access the project site at Street B and the EBRPD driveway. Bicycle access to the project site would be sited to be adequately accommodated by the proposed Street B and EBRPD

driveway and by the proposed EVA road. As such, the proposed project is not anticipated to create a hazardous condition that currently does not exist for bicyclists.

Furthermore, the proposed project would include pedestrian facilities within the project site. Sidewalks would be constructed adjacent to roadways and sited to provide safe access. The proposed project would provide a direct connection for pedestrians between Street A and Dublin Canyon Road from the proposed EVA road. In addition, the proposed project would also develop a traffic signal at Dublin Canyon Road and Canyon Meadows Drive, as shown in Exhibit 2-7b. Installation of the signal at Dublin Canyon Road and Canyon Meadows Drive would provide a new protected pedestrian crossing across Dublin Canyon Road. This signal and associated crosswalks would enhance mobility and safety of vehicles traveling along Dublin Canyon and pedestrians crossing Dublin Canyon to access the EBRPD trailhead. The proposed project is not anticipated to contribute to pedestrian inaccessibility within the project site or adjoining area. Therefore, the proposed project is not anticipated to create hazardous conditions for pedestrians.

The proposed project is not anticipated to substantially increase hazards due to the project design. Stopping sight distance approaching each of the proposed project intersections was found to be adequate, based on the applicable speeds on Dublin Canyon Road. The location and design of the driveways would not affect conditions at the existing intersections of Dublin Canyon Road with Canyon Creek Circle and Canyon Meadows Drive. As such, impacts related to an increase in hazards due to a geometric design feature or incompatible uses would be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

Level of Significance Before Mitigation

Less than significant impact.

Emergency Access

Impact TRANS-4: The proposed project would not result in inadequate emergency access.

Impact Analysis

Construction

Typical activities related to the construction of any development could include lane narrowing and/or lane closures, sidewalk and pedestrian crosswalk closures, and bike lane closures. In the event of any type of closure, clear signage (e.g., sidewalk closure and detour signs) must be provided to ensure vehicles, pedestrians and bicyclists are able to adequately reach their intended destinations safely in and around the project area. The proposed project's plans are subject to review by the City and the Fire Department as part of the standard building permit process to ensure consistency with the City's Fire Code to allow apparatus access and maneuverability. As such, impacts would continue to be less than significant

Operation

Three new internal roadways, Street A, Street B, and Court C, are proposed, which would provide connection to the project site from Dublin Canyon Road. As shown in Exhibit 2-6, Street A would provide a 20- to 21-foot-wide emergency vehicular access via Dublin Canyon Road extending southwest within the project site to its terminus past Court C. The proposed project would not substantially alter existing roadways. As such, the proposed project would not significantly alter or modify the circulation system and therefore would not adversely affect travel times of emergency vehicles. Further, compliance with the with the City's Fire Code and Subdivision regulations would ensure adequate on-site EVA. As such, the proposed project would result in impacts that would be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

Level of Significance Before Mitigation

Less than significant impact.

3.14.7 - Cumulative Impacts

Conflict with a Transportation Policy or Plan

This cumulative impact analysis for Transportation uses the "summary of projections" approach set forth in CEQA Guidelines Section 15130(b)(1)(B), using the General Plan. The geographic context for cumulative Transportation impacts related to a conflict with a transportation policy or plan is the City of Pleasanton.

The Circulation Element of the General Plan includes a set of balanced, long-range, multimodal transportation goals and policies that provide for a transportation network that is safe, efficient, and sustainable (minimizes environmental, financial, and neighborhood impacts). These transportation goals and policies are intended to improve multimodal accessibility to all land uses and create a city where people are less reliant on driving to meet their daily needs. The City's General Plan contains the following policies to encourage the use of non-automobile transportation modes to minimize vehicle trip generation and reduce VMT:

Goal 1 Develop a safe, convenient, and uncongested circulation system.

Policy 1 Complete the City's street and highway system in accordance with the General Plan Map.

Policy 2 Phase development and roadway improvements so that levels of service at adjacent major intersections do not exceed LOS D at major intersections outside Downtown and gateway intersections.

Policy 3 Facilitate the free flow of vehicular traffic on major arterials.

Policy 4 In the Downtown, facilitate the flow of traffic and access to Downtown businesses and activities consistent with maintaining a pedestrian-friendly environment.

Goal 4 Provide a multimodal transportation system which creates alternatives to the single-occupancy automobile.

Policy 13 Phase transit improvements to meet the demand for existing and future development.

Policy 22 Create and maintain a safe, convenient, and effective bicycle system which encourages increased bicycle use.

Policy 23 Create and maintain a safe and convenient pedestrian system which encourages walking as an alternative to driving

Implementation of General Plan Policies and Actions and conformance with mandatory ordinances and policies would substantially limit or preclude Transportation policy conflicts. Moreover, there is no development currently planned in the project vicinity and past and existing development within the geographic context were required to comply with these policies. Accordingly, cumulative impacts are less than significant.

The proposed residential project would provide multimodal infrastructure improvements, such as the striping of 6-foot-wide bike lanes on both sides of Dublin Canyon Road along the project frontage and the construction of sidewalks along Street A, Street B, Street C, and Dublin Canyon Road. Thus, the proposed project would be consistent with the General Plan's policies listed above. Based on the planned improvements, the proposed project would be consistent with the General Plan and would be considered part of the cumulative solution to meet the City's long-range transportation goals. For these reasons and as further discussed in Impact TRANS-1, the proposed project would not have a cumulatively considerable contribution to the less than significant cumulative impacts.

Vehicle Miles Traveled

The geographic scope of analysis for the cumulative impact in the Hidden Canyon VMT Memo is primarily the TAZ 1190 that encompasses the proposed project site and the City of Pleasanton. The VMT estimates and cumulative impact findings provided in the VMT Analysis (Appendix H) are based on the ACTC Countywide Travel Demand Model, which is calibrated to regional conditions and consistent with Plan Bay Area 2040 assumptions. This means the analysis considers both local (TAZ-level) and countywide travel patterns, and the significance thresholds are derived from Alameda County averages. Additionally, the cumulative impact assessment aligns with the City of Pleasanton's 2023–2031 Housing Element EIR, which evaluates residential development impacts within the broader context of citywide and countywide growth projections.

As discussed above, the project's VMT impacts are considered significant and unavoidable, consistent with the findings of the City's Housing Element EIR. The Draft EIR evaluated all feasible

mitigation opportunities; however, the proposed project's VMT would remain above the City's threshold. As a result, no feasible mitigation is available that would fully reduce the proposed project's VMT impacts to a less than significant level. The Housing Element EIR previously disclosed that development at the project site would exceed the CEQA significance threshold for VMT. Therefore, consistent with the conclusions of the Housing Element EIR, the proposed project would conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), as it would generate VMT above the established threshold and contribute to cumulative transportation impacts that cannot be fully mitigated. Therefore, the proposed project's incremental contribution would be cumulatively considerable and potential impacts would be significant and unavoidable, consistent with the City's Housing Element EIR.

Future projects in the City would be evaluated for consistency with the VMT significance threshold by applying the same methodology used in the Housing Element EIR and the proposed project. Specifically, each residential development would be required to prepare a quantitative VMT assessment using the ACTC Countywide Travel Demand Model or an equivalent tool and to compare the project's VMT per capita to the Alameda County average reduced by 15 percent, which serves as the threshold for significance under CEQA Guidelines Section 15064.3, subdivision (b).

Design Hazard

The geographic context for cumulative transportation impacts related to a design hazard is the project vicinity. As there is no development currently proposed in the project vicinity, and past and present projects together with the proposed project would not result in any design hazards, there would be a less than significant cumulative impact. Therefore, the proposed project's incremental contribution to the less than significant impacts would not be cumulatively considerable.

Emergency Access

This cumulative impact analysis for Transportation impacts related to emergency access uses the "summary of projections" approach set forth in Title 14 California Code of Regulations Section 15130(b)(1)(B), using the City's General Plan. The geographic context for cumulative emergency access impacts is the City of Pleasanton.

The geographic context for this impact is the City; however, impacts related to emergency access are generally specific to the individual related projects and generally do not combine to create cumulative impacts. Moreover, the proposed project, together with projected cumulative projects anticipated in the General Plan, would be consistent with the City's Emergency Plan. As shown in Exhibit 3-1, there are no reasonably foreseeable projects within 2 miles of the project site. Past and current projects would be consistent with regulations and requirements in the zoning code; accordingly, the combined development of these projects would have a less than significant cumulative impact related to emergency access.

Moreover, the proposed project would not have a cumulatively considerable contribution to these less than significant impacts as discussed above in Impact TRANS-4.

Level of Cumulative Significance Before Mitigation

The geographic scope of analysis for the cumulative impact in the Hidden Canyon VMT Memo is primarily the TAZ 1190 that encompasses the proposed project site and the City of Pleasanton. The VMT estimates and cumulative impact findings provided in the VMT Analysis (Appendix H) are based on the ACTC Countywide Travel Demand Model, which is calibrated to regional conditions and consistent with Plan Bay Area 2040 assumptions. This means the analysis considers both local (TAZ-level) and countywide travel patterns, and the significance thresholds are derived from Alameda County averages. Additionally, the cumulative impact assessment aligns with the City of Pleasanton's 2023–2031 Housing Element EIR, which evaluates residential development impacts within the broader context of citywide and countywide growth projections. There is an existing significant and unavoidable impact related to VMT.

As discussed above, the proposed project's VMT impacts are considered significant and unavoidable, consistent with the findings of the City's Housing Element EIR. The Draft EIR evaluated all feasible mitigation opportunities; however, the project's VMT would remain above the City's threshold. As a result, no feasible mitigation is available that would fully reduce the proposed project's VMT impacts to a less than significant level. The Housing Element EIR previously disclosed that development at the project site would exceed the CEQA significance threshold for VMT. Therefore, consistent with the conclusions of the City's Housing Element EIR, the proposed project would result in a considerable contribution to a significant and unavoidable impact.

Therefore, the proposed project's incremental contribution would be cumulatively considerable and potential impacts would be significant and unavoidable, consistent with the City's Housing Element EIR.

Moreover, future projects in the City would be evaluated for consistency with the VMT significance threshold by applying the same methodology used in the Housing Element EIR and the proposed project. Specifically, each residential development would be required to prepare a quantitative VMT assessment using the ACTC Countywide Travel Demand Model or an equivalent tool and to compare the project's VMT per capita to the Alameda County average reduced by 15 percent, which serves as the threshold for significance under CEQA Guidelines Section 15064.3, subdivision (b).

Mitigation Measures

None.

Level of Cumulative Significance After Mitigation

Significant and unavoidable impact.

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3.15 - Utilities and Service Systems

3.15.1 - Introduction

This section describes the existing conditions related to utilities and service systems (water, wastewater, stormwater, solid waste, electric power, natural gas, and telecommunications facilities), as well as the relevant regulatory framework. This section also evaluates the potential environmental effects on utilities and service systems that could result from project implementation. Descriptions and analysis in this section are based on information contained in the Pleasanton General Plan, General Plan Environmental Impact Report (General Plan EIR), and 2020 Urban Water Management Plan (UWMP), the Water Distribution System Master Plan Update, Water System Management Plan, Sewer System Management Plan, and the Hydraulic Analysis (Appendix I). One public comment was received during the EIR scoping period regarding utilities and service systems:

- Request for plans related to utility pole and wires on the project site, including coordination with Pacific Gas and Electric Company (PG&E) and/or AT&T and any potential undergrounding.

3.15.2 - Environmental Setting

Potable Water

As a water retailer, the City of Pleasanton provides potable water service to businesses and homes within the City as well as adjacent, unincorporated areas, including the Remen Tract, Happy Valley, and portions west of Foothill Road neighborhoods.[1] The City of Pleasanton currently receives its water supply from Zone 7 Water Agency (Zone 7). Zone 7's water supply comes from the State Water Project supply via the South Bay Aqueduct, water from local watersheds via Lake Del Valle, and groundwater within the Livermore-Valley Groundwater Basin. The water distribution system consists of approximately 340 miles of pipelines and 22,369 water service connections. There are 14 water booster stations, 22 water storage reservoirs, and one hydropneumatics tank in the distribution system. The City's service area has 16 different pressure zones.[2,3] Utilities Division also operates nine fluoridation treatment sites. There are 20 storage reservoirs throughout the City, varying in size from 20,000 gallons to over 8,000,000 gallons.[4]

Alameda County Flood Control and Water Conservation District

Service Area

Zone 7 distributes water supplies to cities, water retailers, and unincorporated areas within the Livermore-Amador Valley area.[5] Zone 7 serves the Cities of Pleasanton, Dublin, Livermore, and a small area in southern San Ramon through four retail water suppliers: the City of Pleasanton, Dublin

[1] West Yost Water. 2021. City of Pleasanton 2020 Urban Water Management Plan. Website: https://www.cityofpleasantonca.gov/assets/our-government/public-works/water-conservation/2020-urban-water-management-plan.pdf. Accessed January 23, 2025.
[2] Ibid.
[3] City of Pleasanton. May 2024. Water Distribution Capacity Plan. Accessed October 30, 2025.
[4] City of Pleasanton. 2008. Proposed Pleasanton General Plan 2005–2025 Draft Environmental Impact Report. Accessed January 23, 2025.
[5] Alameda County Flood Control and Water Conservation District (Zone 7). Service Area. Website: https://www.zone7water.com/service-area. Accessed January 10, 2025.

San Ramon Services District (DSRSD), the City of Livermore, and California Water Service Company of Livermore. Zone 7 and its water retailers serve a population of approximately 220,000.

Water Supply

Zone 7 derives its water from three sources: State Water Project water from the South Bay Aqueduct, surface runoff collected in the Del Valle Reservoir, and local groundwater.[6] In addition to water stored in the local groundwater basin, Zone 7 uses additional out-of-basin groundwater storage during droughts. Water delivered to the City of Pleasanton comes primarily from the State Water Project.

Distribution System

California pumps State Water Project water from the Sacramento-San Joaquin Delta via the California Aqueduct and further via the South Bay Aqueduct. Zone 7 treats this imported water at its Patterson Pass and Del Valle Water Treatment Plants in the City of Livermore and then sends it to the City of Pleasanton via the Zone 7 Cross Valley and Vineyard Pipelines. Zone 7 also stores water from the State Water Project and from local runoff in the Del Valle Reservoir and uses this water to replenish groundwater supplies through release into the Arroyo del Valle and Arroyo Mocho. Zone 7 also uses this water as a secondary local supply to its two water treatment plants.[7]

City of Pleasanton Groundwater Wells

The City of Pleasanton's annual groundwater entitlement is 3,500 acre-feet. Groundwater is generally utilized during summer months to meet peak usage periods, which represents approximately 20 to 25 percent of the City's total water supply needs. Per- and polyfluoroalkyl substances (PFAS) have recently been detected above regulatory requirements in portions of the Livermore-Amador Valley Groundwater Basin. This detection has made all of the City's groundwater wells non-operational.[8] On October 17, 2023 the City Council approved proceeding with the planning of new groundwater wells within the Bernal subbasin and on June 18, 2024, the City Council approved an agreement with Zone 7 to evaluate the feasibility of jointly construction and operating these new groundwater well. The Joint Groundwater Wells Project is currently within its first phase, which includes a feasibility assessment with a target completion by the end of 2025.

Urban Water Management Plan Projections

The City of Pleasanton 2020 UWMP provides a comparison of demand and supply under various scenarios through the year 2045 and summarizes the water supply projections (Table 3.15-1).[9] The UWMP indicates that Zone 7 can meet retailer demands through 2045 through average, single dry, and multiple dry years; therefore, the demand is equivalent to the supply provided.

[6] City of Pleasanton. 2009. Pleasanton General Plan 2005–2025: Water Element. Website: https://www.cityofpleasantonca.gov/assets/our-government/community-development/8.%20Water.pdf. Accessed January 11, 2025.

[7] Ibid.

[8] City of Pleasanton. 2025. Joint Groundwater Wells Project. Website: https://www.cityofpleasantonca.gov/our-government/pleasanton-water/joint-groundwater-wells-project/. Accessed October 21, 2025.

[9] City of Pleasanton. 2021. 2020 Urban Water Management Plan. Website: https://www.cityofpleasantonca.gov/assets/our-government/public-works/water-cosnervation/2020-urban-water-management-plan.pdf. Accessed January 11, 2025.

Table 3.15-1: Projected Retail Water Supplies and Demand

Water Supply	Projected Water Supply				
	2025	2030	2035	2040	2045 (Optional)
	Reasonably Available Volume	Reasonably Available Volume	Reasonably Available Volume	Reasonably Available Volume	Reasonably Available Volume
Supplies					
Zone 7	13,240	13,739	14,237	14,736	14,736
Groundwater	3,500	3,500	3,500	3,500	3,500
Recycled Water	1,500	1,650	1,650	1,800	1,800
Supply Total	18,240	18,889	19,387	20,036	20,036
Demands					
Potable Water	16,740	17,239	17,737	18,236	18,236
Recycled Water	1,500	1,650	1,650	1,800	1,800
Demand Totals	18,240	18,889	19,387	20,036	20,036
Difference	0	0	0	0	0

Note:
Volumes are in acre-feet.
Source: City of Pleasanton. 2021. 2020 Urban Water Management Plan. Website: https://www.cityofpleasantonca.gov/assets/our-government/public-works/water-cosnervation/2020-urban-water-management-plan.pdf. Accessed January 11, 2024.

Zone 7 evaluates and pursues new water supply options, including potable reuse, which would maximize reuse of locally generated wastewater.[10] Zone 7 also continues to support the expansion of recycled water use for irrigation. Additional supplies from reuse would reduce the percentage of Zone 7's water supply derived from imported water supplies. Optimization and expansion of local storage options allow Zone 7 to minimize the use of imported water supplies when necessary.

Recycled Water

The City has two sources of recycled water: the DSRSD and the City of Livermore.[11] The DSRSD's Recycled Water Treatment Facility (RWTF) currently treats the City's wastewater flows and would provide the majority of the City's recycled water after installation of recycled water delivery infrastructure. The City's recycled water system includes approximately 51,500 linear feet of new recycled water pipeline, ranging in diameter from 6 inches to 20 inches, and approximately 22,400 linear feet of existing potable water pipelines repurposed into the recycled water system. This recycled water infrastructure connects to DSRSD's RWTF and the City's existing 8 million gallon (mg) recycled water reservoir (Tassajara Reservoir), which was converted from a potable water storage

[10] City of Pleasanton. 2021. 2020 Urban Water Management Plan. Website: https://www.cityofpleasantonca.gov/assets/our-government/public-works/water-cosnervation/2020-urban-water-management-plan.pdf. Accessed January 11, 2025.
[11] Ibid.

facility in 2017. The City's recycled water system is projected to serve a total of 99 permitted recycled water irrigation use sites (158 metered connections) once all customers have been connected to the system. An estimated 1,800 acre-feet per year (AFY) of recycled water will be supplied to current and future irrigation customers, including City parks, schools, commercial property landscaping, streetscapes, and multi-family residential common areas. This supply will offset both potable water purchased from Zone 7 and local groundwater supplies. The City's certified cross-connection specialist continues to work with the future customers along existing infrastructure in preparation for conversion to the recycled water system.[12]

Wastewater

The City of Pleasanton provides its own sewage collection facilities within the city limits. DSRSD's RWTF and the Livermore Water Reclamation Plant both provide wastewater collection and treatment services for the City's service area. Treated wastewater from both facilities are sent through the Livermore-Amador Valley Water Management Agency (LAVWMA) pipeline for ultimate disposal by the East Bay Dischargers Authority (EBDA) in the San Francisco Bay. The DSRSD provides sewage treatment services under contract with the City. The LAVWMA—a joint powers agency between the Cities of Pleasanton and Livermore, and DSRSD—provides export/treated sewage disposal services for treated sewage effluent.[13]

City of Pleasanton Collection System

The City of Pleasanton owns, operates, and maintains a wastewater collection system within the City's boundaries. Total pipeline length within the service area is approximately 255 miles and consists of local and trunk sewer pipes, ranging from 4 to 36 inches in diameter.[14] As of 2025, local and trunk sewer pipes range from 4 to 60 inches in diameter.[15] In addition, four major trunk sewers are tributary to the wastewater treatment plant and the 10 pump stations in the system.[16] As of 2025, there are 12 pump stations in the system.[17]

The City of Pleasanton's sewer flows do not include sewage from the Ruby Hill area. Under contract with the City of Pleasanton, the City of Livermore treats Ruby Hill wastewater flows. The major trunk lines included in the City's past Wastewater Collection System Master Plan are in place and are sized appropriately to accommodate existing flows.[18] The City's 2018 updated Sewer System Management Plan (SSMP) determined that there is adequate capacity to convey dry-weather flows. However, the SSMP also identified the need for some improvements to the existing collection and pumping system.[19] The City's Capital Improvement Program includes projects designed to maintain the existing system and improve the performance of individual sub-components. With respect to the

[12] City of Pleasanton. 2021. 2020 Urban Water Management Plan. Website: https://www.cityofpleasantonca.gov/assets/our-government/public-works/water-cosnervation/2020-urban-water-management-plan.pdf. Accessed January 11, 2025.
[13] Ibid.
[14] City of Pleasanton. 2018. Sewer System Management Plan. July.
[15] City of Pleasanton. 2025. Sewer System Management Plan. June.
[16] City of Pleasanton. 2015. Pleasanton General 2005–2025. January 6.
[17] City of Pleasanton. 2025. Sewer System Management Plan. June.
[18] City of Pleasanton. 2015. Pleasanton General 2005–2025. January 6.
[19] City of Pleasanton. 2018. Sewer System Management Plan. July.

construction of new sewer main lines, new development will fund and conduct this construction as it occurs.[20]

DSRSD Wastewater Treatment

The DSRSD provides wastewater treatment services to the City of Pleasanton under a number of wastewater treatment and disposal contracts. The DSRSD's RWTF provides primary, secondary, and tertiary wastewater treatment. The RWTF recently completed an expansion project to bring the average dry-weather wastewater flow design capacity from 11.5 million gallons per day (mgd) to 17 mgd. The City is currently entitled to half of this treatment capacity, or 8.5 mgd. At the time of the last General Plan amendment, the City's average annual wastewater flow was approximately six mgd. The current 8.5 mgd wastewater treatment capacity is sufficient to serve the City's planned buildout growth as anticipated in the Pleasanton General Plan.[21]

Livermore-Amador Valley Wastewater Management Agency Wastewater Disposal

LAVWMA exports treated water from the DSRSD RWTF. The facilities consist of storage/flow equalization reservoirs, a large pumping station, and a pipeline to convey the treated wastewater across the Dublin Grade along Interstate 580 (I-580) to the west where the East Bay Discharge Authority treats water before it flows to the San Francisco Bay. LAVWMA receives treated water from the City of Livermore and the DSRSD. LAVWMA facilities are designed to export a maximum flow of 41.2 mgd during wet weather events. The LAVWMA export system is believed to be adequate to serve the City of Pleasanton's General Plan buildout.[22]

Storm Drainage

The City of Pleasanton along with several other agencies in Alameda County are permittees of the Alameda Countywide Clean Water Program. The City also operates under the San Francisco Bay Regional Water Quality Control Board (San Francisco Bay RWQCB) Municipal Regional Stormwater NPDES Permit (MRP).

Under the existing condition, the natural drainage of the project site is predominately covered with vegetation and tall grasses. The City of Pleasanton owns and maintains drainage facilities within the City limits consisting of underground pipes, local channels, and natural swales in hillside areas. These facilities carry water runoff within the drainage basin to the flood control channels (known locally as arroyos). Existing stormwater drainage infrastructure runs along Dublin Canyon Road but does not cross into the project boundaries. The City requires that hillside projects protect natural drainage courses and install silt basins/ retention ponds for controlling pollutants and the runoff-flow rate. To accommodate future buildout of the Planning Area, the City will continue to require that new developments install appropriately sized storm drains.[23]

[20] City of Pleasanton. 2015. Pleasanton General 2005–2025. January 6.
[21] Ibid.
[22] Ibid.
[23] Ibid.

Solid Waste

Pleasanton Garbage Service (PGS) currently provides solid waste collection and disposal services for the City of Pleasanton. These services include collection of solid waste from commercial, industrial, and residential customers within the City. Collected solid waste is sorted at the Pleasanton Transfer Station, which is also operated by PGS and has a design capacity of 720 tons per day.[24]

Landfill Capacity

PGS transports solid waste to the Vasco Road Sanitary Landfill in the City of Livermore, which has a daily permitted capacity of 2,518 tons per day, as shown in Table 3.15-2.[25,26] This facility is estimated to have capacity through 2022.[27]

Table 3.15-2: Landfill Summary

Landfill	Location	Maximum Daily Throughput	Remaining Capacity	Closure Date
Vasco Road Sanitary Landfill	Livermore	2,518 tons	11.56 million cubic yards	2051
Source: California Department of Resources Recycling and Recovery. 2025. SWIS Facility Detail: Vasco Road Sanitary Landfill (01-11-0010). Website: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/9?siteID=8. Accessed January 23, 2025.				

Energy

Electricity

PG&E provides electricity service to all or part of 47 counties in California, including Alameda County, constituting most of the northern and central portions of the State.[28] The company provides natural gas and electric service to approximately 16 million people throughout a 70,000-square-mile service area in northern and central California.[29] PG&E implemented a transmission capacity increase project in the Tri-Valley area in 2002. In the City of Pleasanton, this project included the installation of a new, underground, 230-kilovolt, high-voltage line near Vineyard Avenue and upgraded the existing Vineyard Substation to accommodate the increased electrical capacity.[30]

Natural Gas

PG&E provides natural gas service to all or part of 39 counties in California, including Alameda County, constituting most of the northern and western portions of the State.[31]

[24] City of Pleasanton. 2015. Pleasanton General 2005–2025. January 6.
[25] City of Pleasanton. 2015. Pleasanton General 2005–2025. January 6.
[26] California Department of Resources Recycling and Recovery. 2025. SWIS Facility Detail: Vasco Road Sanitary Landfill (01-11-0010). Website: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/9?siteID=8. Accessed January 23, 2025
[27] Ibid.
[28] Pacific Gas and Electric Company (PG&E). 2014. Electric Service Area Maps. November 17. Website: https:// www.pge.com/tariffs/assets/pdf/tariffbook/ELEC_MAPS_Service%20Area%20Map.pdf. Accessed January 23, 2025.
[29] Pacific Gas and Electric Company (PG&E). 2025. Company Profile. Website: https:// www.pge.com/en/about/company-information/company-profile.html. Accessed January 23, 2025.
[30] PBS&J. 2008. Proposed Pleasanton General Plan 2005-2025 Draft Environmental Impact Report. September.
[31] Pacific Gas and Electric Company (PG&E). 2014. Gas Service Area Maps. November 17.

3.15.3 - Regulatory Framework

Federal

Clean Water Act (National Pollutant Discharge Elimination System)

Municipal stormwater discharges in the Alameda County are regulated under the San Francisco Bay Region Municipal Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit No. CAS612008, Order No. R2-2022-0018, as amended by Order No. R2-2023-0019, adopted May 11, 2022. The RWQCB oversees the MRP. The City of Pleasanton is a permittee of the Alameda Countywide Clean Water Program.

The Clean Water Program is an association of the agencies in Alameda County that manage separate storm drain systems and creek channels that discharge urban runoff to San Francisco Bay. The Clean Water Program has 17 member agencies: the 14 cities in the County, Unincorporated Alameda County, Zone 7 Water Agency, and the Alameda County Water Conservation and Flood Control Division.[32]

Provision C.3 of the permit addresses post-construction stormwater management requirements for new development and redevelopment projects that add and/or replace 5,000 square feet or more of impervious area. Provision C.3 requires the incorporation of site design, source control, and stormwater treatment measures into development projects in order to minimize the discharge of pollutants in stormwater runoff and non-stormwater discharges and to prevent increases in runoff flows. Low Impact Development methods are to be the primary mechanism for implementing such controls.[33]

State

California Green Building Standards Code

The California Green Building Standards Code (CALGreen) was adopted January 12, 2009. Updates to the Code for 2022 went into effect on January 1, 2023. The purpose of this code is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories:

- Planning and design
- Energy efficiency
- Water efficiency and conservation
- Material conservation and resource efficiency
- Environmental air quality

CALGreen addresses exterior envelope (exterior building walls), water efficiency, and material conservation components to reduce energy usage and help meet water use reductions contemplated by Assembly Bill (AB) 32.

[32] Alameda Countywide Clean Water Program. 2017. About the Clean Water Program. Website: https://www.cleanwaterprogram.org/about-us.html. Accessed October 15, 2019.
[33] Alameda Countywide Clean Water Program. 2025. C.3 Stormwater Technical Guidance. June 25.

California Urban Water Management Planning Act

The Urban Water Management Planning Act (California Water Code Sections 10610–10656) requires that all urban water suppliers with at least 3,000 customers prepare UWMPs and update them every 5 years. The act requires that UWMPs include a description of water management tools and options used by that entity to maximize resources and minimize the need to import water from other regions.

Model Water Efficient Landscape Ordinance

The Office of Administrative Law adopted the Model Water Efficient Landscape Ordinance (MWELO) in September 2009 and requires local agencies to implement water efficiency measures as part of their review of landscaping plans. Local agencies can either adopt the MWELO or incorporate provisions of the ordinance into code requirements for landscaping. For new landscaping projects of 2,500 square feet or more that require a discretionary or ministerial approval, the applicant is required to submit a detailed "Landscape Documentation Package" that discusses water efficiency, soil management, and landscape design elements.

California Integrated Waste Management Act

To minimize the amount of solid waste that must be disposed of by transformation and land disposal, the State Legislature passed AB 939, the California Integrated Waste Management Act of 1989. The legislation required each local jurisdiction in the State to set diversion requirements of 25 percent by 1995 and 50 percent by 2000; established a comprehensive statewide system of permitting, inspections, enforcement, and maintenance for solid waste facilities; and authorized local jurisdictions to impose fees based on the types or amounts of solid waste generated. In 2007, Senate Bill (SB) 1016, Wiggins, Chapter 343, Statutes of 2008, introduced a new per capita disposal and goal measurement system that moves the emphasis from an estimated diversion measurement number to using an actual disposal measurement number as a per capita disposal rate factor. As such, the new disposal-based indicator (pounds per person per year) uses only two factors: a jurisdiction's population (or in some cases employment) and its disposal as reported by disposal facilities.

Measure D—the Alameda County Source Reduction and Recycling Initiative

California Public Utilities Commission

The California Public Utilities Commission (CPUC) regulates privately owned telecommunication, electric, natural gas, water, railroad, rail transit, and passenger transportation companies. It is the responsibility of the CPUC to (1) assure California utility customers receive safe, reliable utility service at reasonable rates; (2) protect utility customers from fraud; and (3) promote a healthy California economy. The Public Utilities Code, adopted by the legislature, defines the jurisdiction of the CPUC.

Title 24, California's Energy Efficiency Standards for Residential and Nonresidential Buildings

Title 24, Part 6, of the California Code of Regulations establishes California's Energy Efficiency Standards for Residential and Nonresidential Buildings. The standards were most recently updated in 2022, which went into effect on January 1, 2023.

For purposes of reference, single-family homes built to the 2016 standards will use about 28 percent less energy for lighting, heating, cooling, ventilation, and water heating than those built to the 2013

standards. In 30 years, California will have saved enough energy to power 2.2 million homes, reducing the need to build 12 additional power plants.

Local

City of Pleasanton General Plan

The Pleasanton General Plan sets forth the following goals, policies, and programs related to utilities and service systems.

Public Facilities and Community Programs Element

Goal 3 Promote responsible financing and construction to preserve and enhance Pleasanton's public facilities.

Policy 2 Development should pay its fair share for the construction and use of municipal facilities.

Program 2.1 Require future development to pay its fair share of the cost of purchasing sites and financing needed improvements for existing and future municipal facilities, such as a City Hall, fire stations, athletic facilities, libraries, cultural arts center, etc.

Policy 3 Require annexation to the City as a pre-requisite to utility extension.

Policy 5 To maintain City service standards, construct permanent City sewer, water, and storm drainage improvement as a condition of new development.

Goal 10 Strive to meet or exceed State and County standards for source reduction and waste diversion, including the countywide goal of 75 percent reduction of waste going to landfills by 2010.

Program 26.18 Residential projects with more than three units and all nonresidential projects in the City shall prepare and implement a Project Waste Diversion Plan that includes a discussion of the project's diversion strategies. The plan shall include a description of on-site disposal, composting and recycling facilities, a construction debris disposal and recycling plan, and a discussion of any pre-waste stream conservation measures appropriate to the project. The City shall review and approve waste diversion plans as part of the land entitlement process for projects.

Program 26.1 Continue to promote the recycling of materials at the solid waste transfer station and other locations.

Water Element

Goal 1 Preserve and protect water resources and supply for long-term sustainability.

Program 1.7 Require the installation of water conservation devices in new construction and additions.

Goal 4 Provide sufficient water supply and promote water safety and security.

Policy 4 Ensure an adequate water system and a high quality water supply for existing and future development, and maintain an adequate reserve of water in storage facilities.

Program 4.1 Require new development to pay for its fair share of the City's water system master plan improvements.

Program 4.4 Maintain sufficient water pressure to serve residential, commercial, industrial, and fire-flow requirements as determined by the City Engineer.

Program 4.5 Utilize water reclamation methods to the fullest extent feasible, where safe and nonpolluting.

Goal 5 Provide adequate sewage treatment and minimize wastewater export.

Policy 5 Secure sewage capacity through all available means for residential, commercial, and industrial development.

Program 5.1 Require new development to pay its fair share of the City's planned sewer system improvements including treatment, distribution, reuse, and export facilities.

Policy 6 Approve only those sewage collection, treatment, and export expansion alternatives which are cost- and energy-efficient and do not create a health hazard.

Goal 6 Minimize stormwater runoff and provide adequate stormwater facilities to protect property from flooding.

Policy 8 Ensure an adequate storm drainage system to serve existing and future development.

Program 8.1 Require new development to pay its fair share of the storm drainage system improvement costs.

Program 8.2 Design local storm drainage improvements to carry appropriate design-year flows resulting from buildout of the General Plan.

Program 8.4 As determined by the City Engineer, require new development to improve local storm drainage systems to accept appropriate design-year flows resulting from new development.

Policy 9 Ensure a sufficient flood control system to serve existing and future development.

Program 9.1 Require new development to pay its fair share of the flood control improvement costs included in Zone 7's Master Plan.

Goal 7 Reduce stormwater runoff and maximize infiltration of naturally-occurring rainwater so as to improve surface and subsurface water quality.

Policy 10 Encourage a built environment that minimizes impervious surfaces.

Program 10.1 Review development plans to minimize impervious surfaces and generally maximize infiltration of rainwater in soils, where appropriate. Maximize permeable areas to allow more percolation of runoff into the ground through such means as biofilters, green strips, planter strips, decomposed granite, porous pavers, swales, and other water-permeable surfaces. Require planter strips between the street and the sidewalk within the community, wherever practical and feasible.

Program 10.2 Maximize the runoff directed to permeable areas or to stormwater storage by (1) orienting roof runoff toward permeable surfaces or drains, (2) grading the site to divert flow to permeable areas, (3) using cisterns, retention structures, or green rooftops to store precipitation for reuse, and (4) designing curbs and berms so as to avoid isolating permeable or landscaped areas.

Program 10.3 Encourage design and construction of new streets to be the minimum width possible while still meeting all circulation, flow, and safety requirements. Encourage parking pullouts adjacent to landscaping and previous surfaces, where practical and feasible.

Program 10.6 Discourage additional parking over and above required minimum parking standards for any land use, unless the developer can demonstrate a need for additional parking.

Program 10.7 Create a vegetative buffer between streambeds and development. Developers should retain existing vegetation and, where necessary, plant these buffers with native plant species.

Policy 11 Implement stormwater runoff requirements, as required by the State Regional Water Quality Control Board and the Alameda Countywide Clean Water Program, with as little impact on development and business costs as possible.

Program 11.1 Incorporate conditions of approval developed by the Alameda Countywide Clean Water Program, as appropriate, for new development and discretionary permits.

Program 11.3 Using the California Environmental Quality Act (CEQA) process, evaluate the development effects on stormwater runoff.

Program 11.4 Encourage site planning and design techniques to minimize water quality impacts, including minimizing land disturbance, minimizing impervious surfaces, clustering development, preserving open space, and maintaining riparian areas with buffer zones to reduce runoff into waterways.

Program 11.6 Require use of Best Management Practices for construction activities and ongoing business operations to prevent contaminants from entering the storm drain system.

Energy Element

Goal 1 Move toward a sustainable energy future that increases renewable energy use, energy conservation, energy efficiency, energy self-sufficiency, and limits energy-related financial burdens in Pleasanton.

Policy 4 Reduce heating and cooling energy use in the City.

Program 4.1 Require a built environment that uses the properties of nature. For example: where feasible, requiring projects to take advantage of shade, prevailing winds, landscaping and sun screens to reduce energy use; and requiring projects to use regenerative energy heating and cooling source alternatives to fossil fuels.

Program 4.3 Reduce heat gain and air-conditioning demand by requiring light-colored paving material for roads, parking areas, and cool roofs in both new and redeveloped areas when feasible and cost effective.

Program 6.3 Require green building practices to be used in all projects, including those not covered by the mandatory Green Building Ordinance, if feasible.

Policy 7 Promote renewable energy.

Program 7.5 For new construction, require roofs that are strong enough and have roof truss spacing to hold photovoltaic panels, where feasible and cost effective.

Program 7.6 Require solar water heating and/or photovoltaic-ready roofs in new construction, i.e., roofs with wiring installed for a roof-mounted photovoltaic system, where feasible.

Program 9.2 Continue to require new development to pay its fair share to underground distribution facilities fronting the development and total costs within the development.

Pleasanton Municipal Code

The Pleasanton Municipal Code includes regulations regarding water under Title 14, including regulation of water system and water service fees, water connections, and regulations for protection from water contamination. Title 15 of the Pleasanton Municipal Code establishes standards and conditions related to the use and management of the City of Pleasanton sewer transmission system.

Under Municipal Code Section 9.21, the submittal of a Waste Management Plan to the City is required prior to the issuance of a building, demolition, or similar permit. The Waste Management Plan must identify the volume of construction and demolition materials to be generated, the percentage that will be diverted, the percentage to be placed in landfill, and the debris collector/recycler. Review of this application by the City ensures development projects assist the City in meeting accepted diversion rates consistent with the City's Source Reduction and Recycling Plan.

Pleasanton Water Efficient Landscape Ordinance

The City of Pleasanton adopted a local version of the State Water Efficient Landscape Ordinance, which is more stringent than the State's MWELO. The ordinance applies to new and rehabilitated landscapes for all new and existing public and private development with equal to or greater than 2,500 square feet and is designed to conserve and promote the efficient use of water. The ordinance establishes a structure for the planning, designing, installing, maintaining, and managing of the landscape of new and rehabilitated projects.

3.15.4 - Methodology

FirstCarbon Solutions (FCS) evaluated impacts on utilities and service systems through, among other data and materials, review of the Pleasanton General Plan, City of Pleasanton 2020 UWMP, DSRSD Fact Sheet, and site plans. In addition, agency websites were reviewed for relevant information about facilities and services provided.

3.15.5 - Thresholds of Significance

The Lead Agency utilizes the criteria in the California Environmental Quality Act (CEQA) Guidelines Appendix G Environmental Checklist to establish thresholds of significance to determine whether impacts to utilities and service systems are significant environmental effects. As such, the City has determined that the proposed project would have a potential impact if it would:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

e) Comply with federal, State, and local statutes and regulations related to solid waste.

3.15.6 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the development of the proposed project and provides mitigation measures where appropriate.

Water or Wastewater Treatment Facilities

Impact UTIL-1: The proposed project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Impact Analysis

Construction and Operation

Water Supply

The City of Pleasanton would supply water to the proposed project. The proposed project would construct water lines throughout the project site within internal roadways. On-site water lines would connect to existing 12-inch diameter water lines within Dublin Canyon Road. The proposed project would access road system would also include water connections within the proposed emergency vehicle access roadway, as well as a water pump station.

According to the Hydraulic Analysis prepared for the proposed project, existing system pipelines would see a minor increase in velocities with the addition of the proposed project and no additional pipeline improvements would be required. Additionally, the proposed project would increase the storage requirement in the Moller 770 Pressure Zone by 0.017 mg. Both pressure zones would have sufficient capacity to meet the increased requirement. The proposed project would also increase the pumping capacity requirement by approximately 23 gallons per minute (gpm) in the Moller 770 Pressure Zone and the pressure zones would have sufficient capacity to meet the increased requirement.

Furthermore, the City's 2020 UWMP found that the average per capita water consumption in its service area was approximately 159 gallons per capita per day (gpcd). The proposed project would result in approximately 74 new residents.[34] Thus, the proposed project would consume an estimated 11,766 gallons per day, or approximately 0.01 mgd or 13.18 AFY. As detailed in Table 3.15-1, the City is capable of supplying all projected water demand up to a fifth year drought scenario in 2040 and 2045. Per Table 3.15-1, the City would supply approximately 18,240 AFY, or 16.2 mgd, of water to its service area in 2025. The proposed project's projected 0.01-mgd water supply demand would represent approximately 0.06 percent of the City's supply. Furthermore, because the project site is currently served by the City, its water consumption is factored into the UWMP's planning projections. In addition, the proposed project would be subject to the City's short-term water demand management measures in the event of a drought. Thus, adequate water supplies are available to serve the proposed project and no new or expanded water treatment or conveyance facilities would be required. Furthermore, as discussed under Impact UTIL-2, below, the proposed project would not create the need for new water facilities or result in inefficient water supply. As such, impacts would be less than significant.

Furthermore, CEQA Guidelines 15125(a)(1) requires that an EIR describe physical environmental conditions as they exist at the time the City publishes a Notice of Preparation (NOP) for the Draft EIR.

[34] California Department of Finance (CDF). E-5 City/County Population and Housing Estimates. Website: https://dof.ca.gov/forecasting/demographics/estimates/. Accessed February 24, 2025.

CEQA Guidelines Section 15125(a)(3) further specifies that, "An existing conditions baseline shall not include hypothetical conditions, such as those that might be allowed, but have never actually occurred, under existing permits or plans, as the baseline." In other words, absent specific circumstances, an EIR's analysis of environmental conditions should be based on actual conditions as they existed as of the NOP's release date. The City published the NOP for the proposed project on August 28, 2019.

The analysis provided above for water supply under this threshold is based on the most recently adopted 2020 Urban Water Management Plan for the City at the time of the NOP. However, the City has since adopted the Water System Management Plan in October 2025. This plan discusses water rate and connection fee requirements, as well as capacity, operational, rehabilitation, and repair needs for the City's water system. The proposed project would include construction of water supply infrastructure, including a water pump station, to the project site. The proposed project would be consistent with the distribution capacity projects included in the Water System Management Plan as it would increase the distribution system capacity for the City. Thus, the updated plan would not materially affect the conclusion of the Draft EIR and the proposed project would result in a less than significant impact related to the expansion of water facilities.

Wastewater Treatment

The proposed project would be served by existing sewer facilities provided by the City. The proposed project would install sanitary sewer lines of at least 8-inch diameter to serve all residents. The sanitary sewer lines would be constructed within proposed internal roadways and would subsequently connect to an existing sanitary sewer line within Dublin Canyon Road.

The City's sewer collection infrastructure consists of approximately 255 miles and consists of local and trunk sewer pipes, ranging from 4 to 36 inches in diameter. In addition, four major trunk sewers are tributary to the wastewater treatment plant and the 10 pump stations in the system. The DSRSD provides wastewater treatment services to the City under a number of wastewater treatment and disposal contracts. The DSRSD RWTF provides primary, secondary, and tertiary wastewater treatment. The RWTF recently completed an expansion project to bring the average dry-weather wastewater flow design capacity from 11.5 mgd to 17 mgd. The City is currently entitled to half of this treatment capacity, or 8.5 mgd. At the time of the last General Plan amendment, the City's average annual wastewater flow was approximately 6 mgd. The current 8.5 mgd wastewater treatment capacity is sufficient to serve the City's planned buildout growth as anticipated in the Pleasanton General Plan.

As analyzed under Impact UTIL-3, the proposed project would not generate a significant amount of wastewater relative to the City's current wastewater treatment capacity. Furthermore, existing uses on the project site are currently served by the City, and, as such, the project site is already factored into the City's existing operational capacity and future capacity projections. As such, the City has sufficient capacity to serve the proposed project, and the proposed project would not require relocation or construction of new or expanded wastewater treatment facility. Therefore, impacts would be less than significant.

Moreover, CEQA Guidelines 15125(a)(1) requires that an EIR describe physical environmental conditions as they exist at the time the City publishes an NOP for the Draft EIR. CEQA Guidelines Section 15125(a)(3) further specifies that, "An existing conditions baseline shall not include hypothetical conditions, such as those that might be allowed, but have never actually occurred, under existing permits or plans, as the baseline." In other words, absent specific circumstances, an EIR's analysis of environmental conditions should be based on actual conditions as they existed as of the NOP's release date. The City published the NOP for the proposed project on August 28, 2019.

The analysis provided for wastewater treatment facilities for this threshold is based on the most recently adopted 2018 SSMP for the City at the time of the NOP. However, the City has since adopted the 2025 SSMP. According to the 2025 SSMP, the City's sewer collection infrastructure now consists of approximately 255 miles and consists of local and trunk sewer pipes, ranging from 4 to 60 inches in diameter. The average annual wastewater flow was determined to still be approximately 6 mgd. Thus, the existing sewer facilities within the City have started to expand while the wastewater flow has been relatively similar. Therefore, the updated plan would not materially affect the conclusion of the Draft EIR and the proposed project would result in a less than significant impact related to the expansion of wastewater facilities.

Stormwater Drainage

The project site consists of mostly undeveloped land. Existing water and wastewater infrastructure is located immediately adjacent within Dublin Canyon Road. The proposed project includes bio-retention areas for on-site stormwater management throughout the site, including near the proposed main entrance from Dublin Canyon Road, and along internal private Street A. Throughout the project site, proposed storm drains would connect to the bio-retention areas for pre-treatment before connecting to the City's existing storm drainage system off-site. A 12-inch storm drain exists underneath Dublin Canyon Road. A 24-inch storm drain is proposed along Dublin Canyon Road, which would connect to the project site via 12-inch storm drains. An 18-inch storm drain is also proposed at the intersection of Street A and Street B and following Street A; 12- and 8-inch storm drains are proposed within Court C. A 12-inch storm drain is proposed to follow both the private and public roads surrounding the proposed Lester lots, connecting the roads along Dublin Canyon Road.

Development of the proposed residential units would result in a net increase of impervious surfaces consisting of buildings, paved roadways, and driveways. Increased runoff volume could exceed the capacity of downstream drainage components, causing localized flooding. The proposed project would be served by existing stormwater facilities maintained by the City.

Furthermore, pursuant to the Standard Urban Storm Water Mitigation Plan, the proposed project would be required to implement stormwater Best Management Practices (BMPs) that limit the volume and flow of stormwater to the municipal storm sewer system. Additionally, the proposed project would adhere to the City's Water Efficient Landscape Program, which requires implementation of outdoor irrigation water conservation measures and practices. Therefore, impacts to storm drainage facilities would be less than significant.

Power and Telecommunications

Power services for the proposed project would be provided by PG&E. The proposed project would be served by existing underground utility lines adjacent to the project site in Dublin Canyon Road. Phone and internet services would be provided by local private telecommunications providers, including, but not limited to, AT&T and Comcast. These services are already provided to existing uses on-site and would change negligibly under the proposed project. Therefore, impacts related to the need for relocation or construction of new or expanded power and telecommunications facilities would be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

Water Supplies

Impact UTIL-2:	**The proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?**

Impact Analysis

Construction

Impacts related to sufficient water supplies are limited to operational impacts. No respective construction impacts would occur.

Operation

Table 3.15-3 summarizes the proposed project's estimated water consumption. As discussed in Impact UTIL-1, the City's UWMP had an average water demand of 159 gpcd in 2020, which, assuming a project population of 74 new residents, equates to 13.2 AFY. This amount of water represents approximately 0.06 percent of both the City's 2025 average water supply value and single-year drought scenario supply value of 18,240 acre-feet.[35]

Table 3.15-3: Water Consumption Estimate

Proposed Project New Population	Pleasanton 2020 Per Capita Consumption	Proposed Project Water Consumption	Annual Water Consumption
74	159 gallons per day	11,766 gallons per capita per day	13.18 acre-feet

Notes:
74 dwelling units * 2.62 persons per household equals approximately 74 residents
1 acre-foot = 325,851 gallons
Source: California Department of Finance. 2025.
West Yost. 2021.

[35] West Yost. 2021. City of Pleasanton 2020 Urban Water Management Plan. Website: https://www.cityofpleasantonca.gov/assets/our-government/public-works/water-conservation/2020-urban-water-management-plan.pdf. Accessed January 24, 2024.

Furthermore, because the project site is currently served by the City, its water consumption is factored into the UWMP's planning projections. The proposed project, along with any other user of the City's water supply, would also be required to implement City water demand management measures in the event of a drought to ensure sufficient water supplies. Accordingly, adequate water supplies would be available to serve the proposed project reasonably foreseeable future development during normal, dry, and multiple dry years. Therefore, impacts related to sufficient water supply availability would be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

Wastewater Treatment Capacity

Impact UTIL-3:	**The proposed project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.**

Impact Analysis

Construction

Impacts related to sufficient water supplies are limited to operational impacts. No respective construction impacts would occur.

Operation

The proposed project's estimated wastewater generation is estimated to be at 90 percent of the proposed project's anticipated water demand. The proposed project would consume approximately 11,766 gpd and would thus generate an estimated 10,589.4 gpd (0.01 mgd) of wastewater. This amount of wastewater generation would represent approximately 0.1 percent of the DSRSD RWTF treatment capacity that the City is entitled to. In addition, consistent with applicable State law, the City's development fees would ensure that the project proponent would pay the cost attributable to the increased demand related to the proposed project to maintain the existing level of service and achieve an adopted level of service that is consistent with the City's General Plan and Municipal Code (California Government Code § 66001(g)).

Accordingly, no new or expanded wastewater treatment or conveyance facilities would be required. The City would have adequate capacity to serve the proposed project's projected demand in addition to the provider's existing commitments. As such, impacts would be less than significant.

Furthermore, as discussed in UTIL-1, the analysis of environmental conditions should be based on actual conditions as they existed as of the NOP's release date. The City published the NOP for the proposed project on August 28, 2019. The analysis provided for wastewater treatment facilities for this threshold is based on the most recently adopted 2018 SSMP for the City at the time of the NOP. However, the City has since adopted the 2025 SSMP. According to the 2025 SSMP, the City's sewer

collection infrastructure now consists of approximately 255 miles and consists of local and trunk sewer pipes, ranging from 4 to 60 inches in diameter. The average annual wastewater flow was determined to still be approximately 6 mgd. Thus, the existing sewer facilities within the City have started to expand while the wastewater flow has been relatively similar. Therefore, the updated plan would not materially affect the conclusion of the Draft EIR and the proposed project would result in a less than significant impact related to the expansion of wastewater facilities

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

Attainment of Solid Waste Reduction Goals

Impact UTIL-4:	**The proposed project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

Impact Analysis

Construction

Construction waste from the proposed project would be hauled away from the project site to transfer stations by PGS. Construction waste generation is summarized in Table 3.15-4. As shown in the table, the proposed project would generate approximately 1,371.31 cubic yards of construction and demolition waste. The Vasco Road Sanitary Landfill in Livermore has 11,560,000 cubic yards of remaining capacity and, thus, can accommodate the construction solid waste generated by the proposed project.

Table 3.15-4: Construction and Demolition Solid waste Generation Estimate

Activity	Column Title	Square Feet	Solid Waste Generation	
			Tons	Cubic yards
Demolition	155 pounds/square-foot	17,204 square feet	1,333.31	952.36
Construction	3.89 pounds/square- foot	301,560 square feet	586.53	418.95
Total			**1,919.84**	**1,371.31**

Notes:
1 ton = 2,000 pounds
1.4 tons = 1 cubic yard
Source: United States Environmental Protection Agency (EPA). 1998.
FirstCarbon Solutions (FCS). 2025.

Additionally, construction and demolition debris recycling practices, such as those outlined within Chapter 9.20 of the City's Municipal Code, would divert most, if not all, construction solid waste from landfills. Section 9.21.030 requires the completion and approval of a Waste Management Plan

prior to the issuance of grading or demolition permits and requires that construction and demolition comply with both the City's franchise collector requirements and hauling and self-hauling regulations. Construction and demolition debris recycling involves diverting recoverable materials for reuse or reprocessing, while non-recoverable materials are ground up into Alternative Daily Cover for use at landfills. Impacts would be less than significant.

Operation

Operational waste generation is summarized in Table 3.15-5. As shown in the table, the proposed project would generate 38.3 cubic yards of solid waste annually. The proposed project would be served by PGS, which diverts solid waste to its transfer station, where it is then taken to the Vasco Road Sanitary Landfill in Livermore, which has a remaining capacity if 11,560,000 cubic yards. The proposed project's approximate generation of 0.10 cubic yards of solid waste annually would represent less than 0.01 percent of the total remaining capacity. As such, PGS and the Vasco Road Sanitary Landfill would be able to accommodate the solid waste generated by the proposed project during operation.

Table 3.15-5: Operational Solid Waste Generation Estimate

Use	Waste Generation Rate	Unit Count	Estimated New Population	Solid waste Generation Annually	
				Tons	Cubic yards
Residential	12.23 lbs/household/day	24	74	53.6	38.3

Notes:
lbs = pounds
1 ton= 2,000 pounds
1.4 tons = 1 cubic yards
Source: CalRecycle. 2024.
FirstCarbon Solutions (FCS). 2025.

PGS also provides recycling and green waste collection to customers. Aluminum, glass, plastic, paper, carboard, and organic waste would be collected and diverted from the waste stream. As such, the values discussed in the table above likely overstate the solid waste generation that would be expected to occur from the proposed project. Moreover, the proposed project would be required to adhere to Chapter 9.20 of the City's Municipal Code, which states provisions and regulations regarding solid waste and recycling collection within the City, such as Section 9.20.060, which gives the City the power to make such regulations concerning the number and manner of collections of solid waste, recyclables, and organic waste as it may deem necessary to carry out the provisions of Chapter 9.20. Therefore, the proposed project would not generate excessive amounts of solid waste, and impacts would be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

Solid Waste Regulations

Impact UTIL-5:	**The proposed project would comply with federal, State, and local statutes and regulations related to solid waste.**

Impact Analysis

Construction

During construction, the proposed project would be required to comply with the City's Municipal Code Chapter 9.20 related to solid waste reduction and recycling measures. These measures would ensure compliance with the Integrated Waste Management Act by ensuring project construction waste is transferred to facilities that can adequately recycle solid waste. Thus, with compliance with existing City Municipal Code and the Integrated Waste Management Act, the proposed project would comply with applicable solid waste regulations and statutes during construction and construction-related impacts would be less than significant.

Operation

During project operation, the proposed project would be required to comply with applicable State and local regulations related to solid waste such as the California Integrated Waste Management Act and Chapter 9.20 Solid Waste of the City's Municipal Code. Adherence to the City's Municipal Code would ensure sufficient solid waste collection and transportation is available to the proposed project and would also ensure that disposal sites contain sufficient capacity through permit review and inspections and recycling programs are implemented in order to divert waste. As such, project operation would not impede the ability of the City to meet waste diversion requirements or cause the City to violate State and local statutes and regulations related to solid waste. Therefore, with compliance with existing State and City law requiring recycling and waste diversion from landfill requirements, operational impacts related to solid waste regulations consistency would be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

3.15.7 - Cumulative Impacts

The geographical scope of the cumulative impact analysis for Utilities and Service Systems is the service area of each provider. The analysis considers the foreseeable development projects listed in Chapter 3, Environmental Impact Analysis, Table 3-1, Cumulative Projects, and Exhibit 3-1, Cumulative Projects Location Map, in the City of Pleasanton and the surrounding areas, in addition to the proposed project.

This analysis evaluates whether the impacts of the proposed project, together with the impacts of cumulative development, could result in a cumulatively significant impact with respect to utility and service systems. This analysis also considers whether incremental contribution of impacts associated with the implementation of the proposed project would be significant. Both conditions must apply for a project's cumulative effects to rise to the level of a significant impact. If both conditions apply, this analysis will then evaluate feasible cumulative mitigation that would reduce cumulative effects. If one or both conditions do not apply, cumulative impacts would be less than significant, and no cumulative mitigation is necessary. If there is no impact associated with respect to a particular CEQA threshold, discussion of cumulative impacts is not required.

Water

The geographic scope of the cumulative potable water analysis is the service area of the City of Pleasanton, which provides potable water to residents and businesses within the City. As indicated in the UWMP, the City estimated water demand of future development in the service area and forecast the needed facility upgrades for existing and future demand. The forecast included supply facility upgrades needed to accommodate growth in the City.

Cumulative projects listed in Table 3-1 (refer to Chapter 3, Environmental Impacts Analysis, Table 3-1, Cumulative Projects) are located within the City's service area and would create water supply demand. The City's 2020 UWMP determined that the City would be able to provide adequate water supplies to the City and cumulative projects area.[36] The City would have adequate water supplies to serve the cumulative projects during normal years and up to a 2-year drought scenario in 2045.[37] In events of further drought, the Contra Costa Water District (CCWD) would implement Water Shortage Contingency Measures, which would be consistently applied across all development in its service area. In addition, cumulative projects listed in Table 3-1, would be required to comply with provisions of the City Code and California Green Building Code related to water conservation. The proposed project would similarly be required to implement Water Shortage Contingency Measures and code compliance. Therefore, the proposed project, in conjunction with identified cumulative projects in the City, would result in a less than significant cumulative impact related to water supply and water supply facilities.

Wastewater

The geographic scope of the cumulative wastewater analysis is the service area of the City of Pleasanton, which provides wastewater collection and treatment for residents and business within the City. The City's sewer collection infrastructure consists of approximately 255 miles and consists of local and trunk sewer pipes, ranging from 4 to 36 inches in diameter. In addition, four major trunk sewers are tributary to the wastewater treatment plant and the 10 pump stations in the system. The DSRSD provides wastewater treatment services to the City of Pleasanton under a number of wastewater treatment and disposal contracts. The DSRSD RWTF provides primary, secondary, and tertiary wastewater treatment. The RWTF recently completed an expansion project to bring the

[36] West Yost. 2021. City of Pleasanton 2020 Urban Water Management Plan. Website: https://www.cityofpleasantonca.gov/assets/our-government/public-works/water-conservation/2020-urban-water-management-plan.pdf. Accessed January 24, 2025.
[37] Ibid.

average dry-weather wastewater flow design capacity from 11.5 mgd to 17 mgd. The City is currently entitled to half of this treatment capacity, or 8.5 mgd. At the time of the last General Plan amendment, the City's average annual wastewater flow was approximately 6 mgd. The current 8.5 mgd wastewater treatment capacity is sufficient to serve the City's planned buildout growth as anticipated in the Pleasanton General Plan.

Cumulative projects listed in Table 3-1 are located in the City's service area and would generate volumes of wastewater. The City's UWMP determined that capacity exists to service the City and cumulative project area demand with respect to wastewater treatment facilities.[38] The proposed project would similarly be required to pay applicable impact fees. Furthermore, the proposed project's wastewater increase would represent only a small portion of available capacity. Therefore, the proposed project, in conjunction with identified cumulative projects in the City's service area would result in a less than significant cumulative impact related to wastewater generation and wastewater treatment facilities.

Storm Drainage

The geographic scope for cumulative storm drainage analysis is the area that drains to Alameda Creek, which is the watershed the project site lies within. Cumulative projects listed in Table 3-1 predominantly consist of commercial and residential uses located in the City of Pleasanton that generate volumes of stormwater. All new development would be required to comply with federal, State, and local regulations regarding stormwater, including the NPDES permit. The proposed project would similarly be required to comply with applicable regulations regarding storm drainage. Further, as indicated in the Impact UTIL-1, the proposed project would result in an reduction in project site stormwater peak flow runoff rates. Therefore, the proposed project, in conjunction with the construction of other projects in the watershed, would not result in a significant cumulative impact related to stormwater generation, quality, or stormwater drainage facilities.

Solid Waste

The geographic scope for cumulative solid waste analysis is the service area of PGS. Cumulative projects listed in Table 3-1 consist predominantly of residential uses and would generate solid waste that would increase demand on solid waste facilities to receive, process, and dispose solid waste.

The Vasco Road Sanitary Landfill that serves the City has remaining capacity of 11.56 million cubic yards. Existing solid waste facilities provide sufficient capacity to serve cumulative development anticipated in the City. In addition, all new development would be required to comply with federal, State, and local regulations regarding solid waste, including the payment of fees to be imposed on and collected from residents and businesses served by designated recyclable material collection programs as required by Chapter 9.20 of the City's Municipal Code. Similarly, the proposed project would be required to comply with such applicable regulations. Therefore, the proposed project, in

[38] West Yost. 2021. City of Pleasanton 2020 Urban Water Management Plan. Website: https://www.cityofpleasantonca.gov/assets/our-government/public-works/water-conservation/2020-urban-water-management-plan.pdf. Accessed January 24, 2025

conjunction with identified cumulative projects, would result in a less than significant cumulative impact related to solid waste generation and landfill capacity.

Level of Cumulative Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

3.16 - Wildfire

3.16.1 - Introduction

This section describes the existing wildfire conditions in the project area as well as the relevant regulatory framework. This section also evaluates the possible impacts related to wildfire that could result from implementation of the project. Information in this section is based, in part, on information provided by the California Department of Forestry and Fire Protection (CAL FIRE), the Bay Area Air Quality Management District (BAAQMD), the Livermore-Pleasanton Fire Department, and the City of Pleasanton (City). No public comments were received during the Environmental Impact Report (EIR) scoping period related to wildfire.

3.16.2 - Environmental Setting

Wildfire Hazard Area Designations

City of Pleasanton

The City recently adopted the Urban Forest Master Plan in September 2025, which includes identification of wildland urban interface (WUI) and Fire Hazard Severity Zones (FHSZs) within the Pleasanton Wildfire Appendix.[1] According to the Urban Forest Master Plan, the City is designated as a Local Responsibility Area (LRA) that contains High and Moderate FHSZs along the western, southern, and southeastern city limits.

Project Site

According to CAL FIRE, the entirety of the project site is currently located in a High FHSZ within a State Responsibility Area (SRA).[2] However, the proposed project would include annexation of the project site to the City. As such, the project site would transition to being located in a High FHSZ within an LRA.

Wildfire-conducive Conditions

Grassland or other vegetation in California is easily ignited, particularly in dry seasons. Wildfire is a serious hazard in high dry fuel load areas, particularly near areas of natural vegetation and steep slopes since fires tend to burn more rapidly on steeper terrain. Wildfire is also a serious hazard in areas of high wind, given that fires will travel faster and farther geographically when winds are higher. Furthermore, wildfire is more likely in areas where electric power lines are located above ground, where they may encounter vegetation or building materials.

City of Pleasanton

According to CAL FIRE, 903 urban acres in the City are subject to high or very high wildfire threat, and 6,157 acres are in WUI fire threat areas.[3] Areas of the City that pose a wildfire risk are in the hills

[1] City of Pleasanton. 2025. Urban Forest Master Plan. Website: https://www.cityofpleasantonca.gov/assets/our-government/public-works/engineering/landscape-ordinance/Urban-Forest-Master-Plan.pdf. Accessed November 10, 2025.
[2] California Department of Forestry and Fire Protection (CAL FIRE). 2023. FHSZ Viewer. Website: https:// calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008. Accessed February 27, 2025.
[3] City of Pleasanton. 2008. Pleasanton General Plan 2005-2025: Draft Environmental Impact Report (DEIR). Accessed February 27, 2025.

west of I-680 and in the hills to the south of the most developed areas of the City, due to fuel loading and topography. The center of the City is not considered to be an area of high risk.

Project Site

The project site is located near the northwestern portion of the City and ranges from approximately 442 feet to 650 feet in elevation. According to the City's Urban Forest Master Plan, the project site is located within a WUI.

Emergency and Evacuation Routes/Access

Northern California

CAL FIRE is responsible for fire protection and stewardship of over 31 million acres of California's privately owned wildlands.[4] CAL FIRE also provides varying levels of emergency services in 36 of California's 58 counties via contracts with local governments. As a result of its major incident management experience and department size, CAL FIRE is often asked to assist or take the lead in disaster response.[5] In November 2018, the Camp Fire wildfire occurred in Northern California, resulting in the deadliest wildfire to occur in State history, causing 85 deaths, destroying 18,804 structures, and burning 153,336 acres of land.[6] In August 2020, the SCU Lightning Complex wildfire occurred over Stanislaus, Santa Clara, Alameda, Contra Costa, and San Joaquin Counties, and burned 396,625 acres of land.[7]

City of Pleasanton

The Livermore-Pleasanton Fire Department (LPFD) provides the Cities of Pleasanton and Livermore with fire protection and emergency medical services.[8] The LPFD is responsible for fire protection and suppression for all areas within the City limits, in addition to providing contractual services in a number of developed areas outside the City limits, including Happy Valley, the Remen Tract, and the Castlewood Country Club. In 2020, the LPFD served a population of approximately 171,385 in an approximately 49.45 square mile area.[9] The LPFD has an automatic mutual aid agreement with the Alameda County Fire Department (ACFD) to provide voluntary fire protection, rescue, and emergency medical services, without supplanting day-to-day services of the ACFD service area.

CAL FIRE's Sunol Range Station has jurisdiction in the Pleasanton, Main, and Sunol Ridges, in the Southeast Hills, and in several areas of unincorporated of unincorporated land adjacent to the City limits.

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4 California Department of Forestry and Fire Protection (CAL FIRE). About CAL FIRE. Website: https://www.fire.ca.gov/#:~:text=About%20CAL%20FIRE,of%20California's%20privately%2Downed%20wildlands. Accessed February 27, 2025.

5 California Department of Forestry and Fire Protection (CAL FIRE). All-Hazard Response. Website: https://www.fire.ca.gov/what-we-do/all-hazard-response#:~:text=As%20a%20leader%20in%20major,Camp%20Fire%20in%20Butte%20County%3B. Accessed February 27, 2025.

6 California Department of Forestry and Fire Protection (CAL FIRE). 2022. Camp Fire. Website: https://www.fire.ca.gov/incidents/2018/11/8/camp-fire. Accessed February 27, 2025.

7 California Department of Forestry and Fire Protection (CAL FIRE). 2022. SCU Lightning Complex. Website: https://www.fire.ca.gov/incidents/2020/8/16/scu-lightning-complex. Accessed February 27, 2025.

8 City of Pleasanton. 2008. Pleasanton General Plan 2005-2025: Draft Environmental Impact Report (DEIR). Accessed February 27, 2025.

9 Livermore-Pleasanton Fire Department (LPFD). 2020. Year End Report—2020. Website: https://www.lpfire.org/home/showpublisheddocument/6001/637575327264800000. Accessed February 27, 2025.

Project Site

As discussed in Section 3.12, Public Services, the nearest fire station to the project site is Station No. 2 at 6300 Stoneridge Mall Road, approximately 1.6 miles east of the project site, with the next closest fire station being Station No. 4 at 1600 Oak Vista Way, approximately 4.0 miles southeast of the project site.

The proposed project would evacuate via the proposed Street A on the project site which would connect to Dublin Canyon Road.

Post-fire Slope Instability and Drainage Pattern Changes

Slope instability from wildfire scarring of the landscape can result in more intensive flooding and landslides. These post-fire slope soils and altered drainage patterns can more easily creep away downslope sides of foundations and can also reduce lateral support.

City of Pleasanton

The storm drainage system is composed of curb inlets, pipes, and natural swales that carry runoff to flood control channels known as arroyos.

Project Site

As previously indicated, the project site is located in a High Fire Hazard Severity Zone.[10] In addition, the City's General Plan Figure 5-1 indicates the project site is within an earthquake induced landslide zone. Wildfire has not recently occurred on the project site and, therefore, does not have a slope-related instability risk related to wildfire.

3.16.3 - Regulatory Framework

Federal

United States Department of Interior

Review and Update of the 1995 Federal Wildland Fire Management Policy

1. **Safety—**Firefighter and public safety is the first priority. All Fire Management Plans and activities must reflect this commitment.
2. **Fire Management and Ecosystem Sustainability—**The full range of fire management activities will be used to help achieve ecosystem sustainability, including its interrelated ecological, economic, and social components.
3. **Response to Wildland Fire—**Fire, as a critical natural process, will be integrated into land and resource management plans and activities on a landscape scale, and across agency boundaries. Response to wildland fire is based on ecological, social, and legal consequences of the fire. The circumstances under which a fire occurs, and the likely consequences on firefighter and public safety and welfare, natural and cultural resources, and values to be protected dictate the appropriate management response to the fire.

[10] California Department of Forestry and Fire Protection (CAL FIRE). 2023. FHSZ Viewer. Website: https:// calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008. Accessed February 27, 2025.

4. **Use of Wildland Fire—**Wildland fire will be used to protect, maintain, and enhance resources and, as nearly as possible, be allowed to function in its natural ecological role. Use of fire will be based on approved Fire Management Plans and will follow specific prescriptions contained in operational plans.

5. **Rehabilitation and Restoration—**Rehabilitation and restoration efforts will be undertaken to protect and sustain ecosystems, public health, and safety, and to help communities protect infrastructure.

6. **Protection Priorities—**The protection of human life is the single, overriding priority. Setting priorities among protecting human communities and community infrastructure, other property and improvements, and natural and cultural resources will be based on the values to be protected, human health and safety, and the costs of protection. Once people have been committed to an incident, these human resources become the highest value to be protected.

7. **Wildland Urban Interface—**The operational roles of federal agencies as partners in the wildland urban interface are wildland firefighting, hazardous fuels reduction, cooperative prevention and education, and technical assistance. Structural fire suppression is the responsibility of tribal, State, or local governments. Federal agencies may assist with exterior structural protection activities under formal Fire Protection Agreements that specify the mutual responsibilities of the partners, including funding. (Some federal agencies have full structural protection authority for their facilities on lands they administer, and may also enter into formal agreements to assist State and local governments with full structural protection.)

8. **Planning—**Every area with burnable vegetation must have an approved Fire Management Plan. Fire Management Plans are strategic plans that define a program to manage wildland and prescribed fires based on the area's approved land management plan. Fire Management Plans must provide for firefighter and public safety; include fire management strategies, tactics, and alternatives; address values to be protected and public health issues; and be consistent with resource management objectives, activities of the area, and environmental laws and regulations.

9. **Science—**Fire Management Plans and programs will be based on a foundation of sound science. Research will support ongoing efforts to increase our scientific knowledge of biological, physical, and sociological factors. Information needed to support fire management will be developed through an integrated interagency fire science program. Scientific results must be made available to managers in a timely manner and must be used in the development of land management plans, Fire Management Plans, and implementation plans.

10. **Preparedness—**Agencies will ensure their capability to provide safe, cost-effective fire management programs in support of land and resource management plans through appropriate planning, staffing, training, equipment, and management oversight.

11. **Suppression—**Fires are suppressed at minimum cost, considering firefighter and public safety, benefits, and values to be protected, consistent with resource objectives.

12. **Prevention—**Agencies will work together and with their partners and other affected groups and individuals to prevent unauthorized ignition of wildland fires.
13. **Standardization—**Agencies will use compatible planning processes, funding mechanisms, training and qualification requirements, operational procedures, values to be protected methodologies, and public education programs for all fire management activities.
14. **Interagency Cooperation and Coordination—**Fire management planning, preparedness, prevention, suppression, fire use, restoration and rehabilitation, monitoring, research, and education will be conducted on an interagency basis with the involvement of cooperators and partners.
15. **Communication and Education—**Agencies will enhance knowledge and understanding of wildland fire management policies and practices through internal and external communication and education programs. These programs will be continuously improved through the timely and effective exchange of information among all affected agencies and organizations.
16. **Agency Administrator and Employee Roles—**Agency administrators will ensure that their employees are trained, certified, and made available to participate in the wildland fire program locally, regionally, and nationally as the situation demands. Employees with operational, administrative, or other skills will support the wildland fire program as necessary. Agency administrators are responsible and will be held accountable for making employees available.
17. **Evaluation—**Agencies will develop and implement a systematic method of evaluation to determine effectiveness of projects through implementation of the 2001 Federal Fire Policy. The evaluation will assure accountability, facilitate resolution of areas of conflict, and identify resource shortages and agency priorities.

State

California Emergency Response Plan

California has developed an emergency response plan to coordinate emergency services provided by federal, State, and local governments and private agencies. Responding to hazardous materials incidents is one part of this plan. The plan is administered by the California Governor's Office of Emergency Services, which coordinates the responses of other agencies. When Contra Costa County experiences an emergency, an Emergency Operations Center may be opened. In the event an Emergency Operations Center is opened, emergency response team members coordinate efforts and work with local fire and police agencies, emergency medical providers, the California Highway Patrol, CAL FIRE, California Department of Fish and Wildlife, and California Department of Transportation (Caltrans).

California Department of Forestry and Fire Protection Threat Potential Mapping

CAL FIRE has mapped fire threat potential throughout California. CAL FIRE maps fire threat based on the availability of fuel and the likelihood of an area burning (based on topography, fire history, and climate). The threat levels include no fire threat, moderate, high, and very high fire threat. Further,

the maps designate the City of Pleasant Hill as the LRA of the project site. Additionally, CAL FIRE produced a 2010 Strategic Fire Plan for California, which contains goals, objectives, and policies to prepare for and mitigate the effects of fire on California's natural and built environments. The CAL FIRE Office of the State Fire Marshal provides oversight of enforcement of the California Fire Code as well as overseeing hazardous liquid pipeline safety.

California Building Standards Code

The State of California provided a minimum standard for building design through the 2022 California Building Standards Code (CBC), which is located in Part 2 of Title 24 of the California Code of Regulations. The 2022 CBC is based on the 2021 International Building Code, but has been modified for California conditions. It is generally adopted on a jurisdiction by-jurisdiction basis, subject to further modification based on local conditions. Commercial and residential buildings are plan-checked by local City and County building officials for compliance with the CBC. Typical fire safety requirements of the CBC include the installation of sprinklers in all new high-rise buildings and residential buildings; the establishment of fire resistance standards for fire doors; building material; and particular types of construction. Additionally, section 701A.3.1 of the CBC requires all structures located within an LRA to construct roof and attic ventilation.

California Public Resources Code

The California Public Resources Code includes fire safety regulations that restrict the use of equipment that may produce a spark, flame, or fire; require the use of spark arresters[11] on construction equipment that use an internal combustion engine; specify requirements for the safe use of gasoline-powered tools in fire hazard areas; and specify fire suppression equipment that must be provided on-site for various types of work in fire-prone areas.

These regulations include the following:

- Earthmoving and portable equipment with internal combustion engines would be equipped with a spark arrester to reduce the potential for igniting a wildland fire (Public Resources Code [PRC] § 4442);
- Appropriate fire suppression equipment would be maintained during the highest fire danger period—from April 1 to December 1 (PRC § 4428);
- On days when a burning permit is required, flammable materials would be removed to a distance of 10 feet from any equipment that could produce a spark, fire, or flame, and the construction contractor would maintain the appropriate fire suppression equipment (PRC § 4427); and
- On days when a burning permit is required, portable tools powered by gasoline-fueled internal combustion engines would not be used within 25 feet of any flammable materials (PRC § 4431).

[11] A spark arrester is any device that prevents the emission of flammable debris from a combustion source (i.e., fireplaces, internal combustion engines, and wood-burning stoves).

Regional

Association of Bay Area Governments Hazard Mitigation Plan

The Association of Bay Area Governments (ABAG) multi-jurisdictional Local Hazard Mitigation Plan for the San Francisco Bay Area was updated in 2010 in partnership with the Bay Conservation and Development Commission. The Adapting to Rising Tides Program supports local governments in the regional plan for existing and future hazards of climate change. This detailed 5-year plan identifies potential natural and human-made hazards, assesses their potential risks, and includes mitigation methods to reduce risks. The potential hazards identified in the plan include earthquakes and liquefaction, wildfires, floods, drought, solar storms, dam or levee failure, disease outbreak, freezes, wind, heat, thunder and lightning storms, siltation, tornadoes, hazardous materials, slope failure and mudflows, and other hazards. Similarly, mitigation measures include hazard event planning, emergency preparedness coordination, education, facility upgrades, and monitoring actions.

Tri-Valley Local Hazard Mitigation Plan

In 2024, the City of Pleasanton, the cities of Livermore and Dublin, the LPFD, Dublin San Ramon Services District, and the Lawrence Livermore National Laboratory updated and adopted the Tri-Valley Local Hazard Mitigation Plan (LHMP).[12] The Tri-Valley LHMP administers a uniform hazard mitigation strategy for the Tri-Valley Area and addresses several hazards including, but not limited to, wildland fire, floods, and earthquakes. The Tri-Valley LHMP includes nine area-wide mitigation actions and 11 Pleasanton-specific mitigation actions including emergency response and evaluation plans, public outreach, building safety and retrofitting, emergency preparedness coordination, education, facility upgrades, and monitoring actions. The LHMP contains the following goals aimed at reducing the vulnerability from natural hazards:

- Ensure that hazards are identified and considered in land use decisions.
- Improve local emergency management capability.
- Promote community awareness, understanding, and interest in hazard mitigation policies and programs.
- Incorporate hazard mitigation as an integrated public policy and standard practice.
- Reduce community exposure and vulnerability to hazards where the greatest risk exists.
- Increase resilience of infrastructure and critical facilities.
- Promote an adaptive and resilient planning area that responds proactively to future conditions.
- Develop and implement mitigation strategies that identify the best alternative to protect natural resources, promote equity, and use public funds in an efficient and cost-effective manner.

[12] Tetra Tech. 2024. Tri-Valley Local Hazard Mitigation Plan (LHMP). Website: https://www.livermoreca.gov/home/showpublisheddocument/11608/638544852506600000. Accessed March 25, 2025.

Livermore-Pleasanton Fire Department Vegetation Management Standards

Defensible Space

In addition to General Weed Abatement, the following areas shall be maintained as defensible space:

- Within 20 feet of end of pavement of roads/sidewalks;
- Within 100 feet of any structure (structures on the subject property or on neighboring properties);
- 10 feet on either side of formal foot trails; and
- 10 feet on either side of a combustible fence.

General: 0-100 feet from structures

- Cut or mow annual grass down to a maximum height of four inches. An increase is allowed when required control erosion on steep slopes—contact the Fire Department for details.
- Spacing
  - Create horizontal space between shrubs and trees (see LPFD Vegetation Management Standards)
    - Create vertical space between grass, shrubs, and trees (see LPFD Vegetation Management Standards)
    - Alternative for areas 30 feet or more from structures: use Continuous Canopy Option (see LPFD Vegetation Management Standards)
- Remove fallen leaves, needles, twigs, bark, cones, and small branches. However, they may be permitted to a depth of 4 inches
- Remove dead and dying trees, bushes, and brush

Structures: 0-30 feet from structures

- Remove all dead plants, grasses, and weeds
- Remove dead or dry leaves and pine needles on the ground
- Remove/trim branches that overhang the roof or come within 10 feet of a chimney (see LPFD Vegetation Management Standards)
- Ensure wood piles are at least 30 feet from structures

Local

City of Pleasanton General Plan

The City of Pleasanton General Plan contains the following goals, policies, and programs related to wildfires:

Public Safety Element

Goal 3 Minimize the risks to lives, property, and the environment due to fire hazards within the Planning Area, and provide the highest quality of emergency response service feasible.

Policy 8 Provide an adequate level of fire and emergency medical equipment and personnel to protect the community.

Program 8.2 Require new development to pay for fire safety improvement needs generated by the new development.

Policy 10 Strive to respond to all emergency fire-related calls within seven minutes of the time the call for service is received 90 percent of the time.

Program 10.1 Deny proposed developments not within a five-minute travel time of a Fire Station unless acceptable mitigations are provided.

Policy 11 Maintain or improve the City's existing Insurance Services Office fire protection rating of three.

Program 11.1 Require developers to finance and construct necessary water facilities for their projects when they develop.

Program 11.2 Require that all new developments be provided with sufficient fire-flow facilities at the time of development at least at the level specified by the Fire Chief.

Policy 13 Require fire mitigation measures in new and existing developments that reduce the fire threat to the structure and occupants. Require development outside the five-minute travel time and in Special Fire Protection Areas to provide effective fire prevention measures.

Program 13.1 Require the installation of building and fire code compliant fire-detection and alarm equipment in residential and commercial structures.

Program 13.2 Install automatic fire sprinkler protection in certain structures as required by adopted City ordinances.

Program 13.3 Encourage the installation of automatic fire sprinkler systems in all new construction.

Program 13.6 Where appropriate in Special Fire Protection Areas, require development to incorporate wildland interface mitigation measures such as greenbelts, defensible space around structures, and other preventive measures.

Program 13.7 Require all projects in the Special Fire Protection Areas seeking building or planning approval to landscape with fire-resistant plant materials.

City of Pleasanton Comprehensive Emergency Management Plan

The Comprehensive Emergency Management Plan addresses the response to emergency incidents associated with emergencies within the City. This Comprehensive Emergency Management Plan is based on the functions and principles of the California Standardized Emergency Management System, the National Incident Management System, and the Incident Command System.

Pleasanton Municipal Code

The Municipal Code includes several regulations pertaining to wildfire, which are summarized below.

Fire Safety Ordinances

The Pleasanton Municipal Code contains three sections that bear directly on fire safety. The Building Code, Chapter 20.08, provides minimum standards for design, construction, materials, occupancy, location, and maintenance of all buildings within the City. Fire Code, Chapter 20.24, regulates how a building is used, how machines and equipment are maintained, how hazardous materials are handled and stored, and how access to and from a site is provided. Fire Code, Chapter 20.24.160, includes a requirement for automatic fire extinguishing systems in all new buildings and structures, as well as some modifications that add floor area or change occupancy. The Subdivision Ordinance, Chapter 19.36, establishes standards for roadway dimensions, subdivision layout, and public improvements needed to protect public safety. In addition, all new developments are reviewed by City departments for their potential effects on public safety, and conditions of approval are attached to minimize such effects and inspections are conducted to ensure proper installation. Developments located outside the 5-minute response time areas are required to provide additional fire mitigation measures, which include, at a minimum, automatic fire sprinkler systems.

3.16.4 - Methodology

This evaluation focuses on whether the proposed project would result in changes to the physical environment that would cause or exacerbate adverse effects related to wildfires or whether the proposed project would be placed in a location susceptible to wildfire or post-wildfire conditions. The evaluation also includes a determination of whether changes to the physical environment caused by the proposed project would impair or interfere with emergency response plans, expose people to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire, expose people/structures to downslope flooding or landslides, or include installation or maintenance of infrastructure that may exacerbate fire risk. The following analysis is based, in part, on information provided by the General Plan and the CAL FIRE website.

3.16.5 - Thresholds of Significance

The Lead Agency utilizes the criteria in the California Environmental Quality Act (CEQA) Guidelines Appendix G Environmental Checklist to determine whether wildfire impacts from implementation of the proposed project would be considered significant.

> If located in or near State Responsibility Areas or lands classified as very high fire hazard severity zones, the project could have a significant impact if it would:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

For purposes of this analysis, the following criteria is used to evaluate the significance of wildfire impacts resulting from implementation of the proposed project:

- Impaired implementation of or interference with an adopted emergency response plan or emergency evacuation plan via blockage of an evacuation route or provision of only one access point for emergency vehicles.
- Location in or near areas of steep slopes, high wind areas, or historical wildfire burn areas leading to greater wildfire risk and, thereby, exposing project occupants to smoke and other wildfire-related air pollutants.
- Installation or maintenance of roads, fuel breaks, emergency water sources, electrical power lines, or natural gas lines that may exacerbate fire risk.
- Location in or near area of wildfire-scarred slopes or altered drainage areas and, thereby, exposing project occupants to flooding and landslide hazards.

3.16.6 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the development of the project and provides mitigation measures where appropriate.

Emergency Response/Evacuation Plan Consistency

Impact WILD-1:	**The proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan.**

Impact Analysis

The project site is located in a High Fire Hazard Severity Zone. The City of Pleasanton has in place several emergency plans regarding public safety and emergency evacuations, including the General Plan Safety Element, Emergency Management Plan (EMP), and LHMP. The EMP provides safety measures for the community in the event of a natural disaster (earthquake, flood, or fire), human-caused emergencies, or hazardous materials spill. The EMP provides a framework for coordination of response and recovery efforts within the City in coordination with local, State and federal agencies.

The City General Plan Safety Element also provides information, policies, and programs directed toward reducing the potential for human injury and loss of life, and to minimize property damage and economic and social disruption due to natural and human-made hazards.

As indicated in Section 3.12 Public Services, the proposed project would be adequately served by police and fire services. The proposed residential units would be constructed in compliance with the California Fire Code with regard to access and building materials such as tile or other fire-resistant roofing. A landscaped gated entry off Dublin Canyon Road would provide access for the new homes. Three new internal roadways, Street A, Street B, and Court C are proposed, which would provide connection to the project site from Dublin Canyon Road. Street A would provide a 20- to 21-foot-wide Emergency Vehicular Access (EVA) via Dublin Canyon Road extending southwest within the project site to its terminus past Court C and would be designed in accordance with the City's Standards and Specifications guidebook to accommodate large emergency vehicles such as fire engines.

The Alameda County Emergency Operations Plan (EOP), Pleasanton EMP, LHMP, and the Safety Element of the 2025 General Plan do not list emergency evacuation routes. Interstate 580 (I-580) and I- 680 would be the most likely evacuation routes to be used in case of an emergency. The Safety Element of the General Plan and the EOP has emergency preparedness policies and plans in case an emergency takes place. The proposed project would not interfere with evacuation along these routes or otherwise conflict with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

Expose Project Occupants to Pollutant Concentrations from Wildfire

Impact WILD-2:	**The proposed project would not due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.**

Impact Analysis

A significant impact would occur if the project site contained specific conditions that would exacerbate wildfire risks, including exposure to wildfire-related pollutants or uncontrolled spread of a wildfire and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

Construction and Operation

The project site is located in a High Fire Hazard Severity Zone as delineated by CAL FIRE. The proposed project would include annexation of the project site to the City. As such, the proposed project would be transitioned to being located within an LRA. The proposed project would be adequately served by the Pleasanton-Livermore Fire Protection District's Fire Station 2, which is

located east of the project site. Proposed residences would be required to comply with the California Fire Code with regard to access and building materials. Adherence to the Public Resource Code Section 4291 (providing defensible space around buildings and restriction of fire-prone plant materials and flammable mulches) would reduce the risk of damage from fire to the maximum extent practicable.

The Building Code, Chapter 20.08, provides minimum standards for design, construction, materials, occupancy, location, and maintenance of all buildings within the City. Additionally, pursuant to section 701A.3.1 of the CBC, all structures located within an LRA would be required to construct roof and attic ventilation. The 2021 California Fire Code regulates how a building is used; how machines and equipment are maintained; how hazardous materials are handled and stored; and how access to and from a site is provided. The Subdivision Ordinance, Chapter 19.36, establishes standards for roadway dimensions, subdivision layout, and public improvements needed to protect public safety. In addition, all new developments are reviewed by City departments for their potential effects on public safety, and conditions are attached to minimize those effects and inspections are conducted to ensure proper installation. Developments located outside the 5-minute travel time areas are required to provide additional fire mitigation measures, which include, at a minimum, automatic fire sprinkler systems pursuant to General Plan Program 10.1. The proposed project would comply with the Building Code and Subdivision Ordinance and would be reviewed by City departments as required. As such, impacts would be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

Infrastructure That Exacerbates Fire Risk

Impact WILD-3:	**The proposed project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.**

Impact Analysis

A significant impact would occur if the proposed project includes a component that may exacerbate fire risk or require a component to reduce fire risk that would result in temporary or ongoing impacts to the environment.

Construction

Construction activities may temporarily increase fire risk due to equipment use and other construction actions on the project site that could be ignition sources. Implementation of regular construction site watering consistent with Best Management Practices (BMPs) would reduce risks associated with wildfire caused by unintentional equipment sparks during grading. Standard construction BMPs would also support the suppression of fire sources and appropriate response should fire result during construction activities. As such, impacts would be less than significant.

Operation

While the proposed project does not require the installation or maintenance of infrastructure specifically for the purposes of reducing wildfire risk, it would incorporate some inherently fire-resistant features, including the undergrounding of utility infrastructure, the implementation of an irrigated, drought-resistant landscaping plan, and the development of defensible space. The proposed project would include typical on-site infrastructure including roads, fire hydrants, and utilities similar to surrounding uses. The installation and maintenance of such would be completed in a typical manner and would not exhibit unusual characteristics that would exacerbate fire risk or create additional temporary or ongoing impacts to the environment.

Additionally, the design of the proposed project and associated infrastructure would be consistent with the CBC and applicable provisions of the California Fire Code with regard to fire and emergency access and building materials, and the requirements of the General Plan Public Safety Element for areas within a special fire protection area. Therefore, impacts related to infrastructure that could exacerbate fire risk would be less than significant.

Level of Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

Flooding and Landslide Hazards Due To Post-fire Slope Instability/Drainage Changes

Impact WILD-4:	**The proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.**

Impact Analysis

A significant impact would occur if the proposed project were located in an area susceptible to downstream flooding or landslide post-fire event.

Construction and Operation

The proposed residential units would be constructed in compliance with the California Fire Code with regard to access and building materials such as tile or other fire-resistant roofing. All driveways and internal roadways would be designed in accordance with the City's Standards and Specifications guidebook to accommodate large emergency vehicles such as fire engines.

The project site is located in a High Fire Hazard Severity Zone and is located in an area outside a 500-year flood zone, as delineated by the General Plan. However, the Geotechnical Review indicated the northern portion of the project site to have a high susceptibility to landslides and the downhill creep of colluvial soils having potential slope instability. Furthermore, the northeastern and southwestern slopes of the project site are designated as a Landslide Zone of Required Investigation by the California Geological Survey (CGS). Since the project site is located on steep topography, has features indicating erosional processes, and portions are delineated within Landslide Zones of Required Investigation by the CGS, impacts related to the direct or indirect loss, injury, or death involving

landslides induced from strong seismic shaking would be potentially significant. As such, the proposed project would be required to implement MM GEO-1, which would require the proposed project to perform a design-level geotechnical investigation on the project site by a qualified Geotechnical Engineer and incorporate recommendations therein into all project plans prior to issuance of building and grading permits.

Compliance with City regulations including a City Grading and Drainage Plan, Erosion Control Measures, BMPs, and the implementation of MM GEO-1 would reduce the risk of possible impacts related to flooding and landslides. As such, impacts would be less than significant with mitigation incorporated.

Level of Significance Before Mitigation

Potentially significant impact.

Mitigation Measures

Implement MM GEO-1.

Level of Significance After Mitigation

Less than significant impact.

3.16.7 - Cumulative Impacts

The geographic scope of the cumulative impact analysis for wildfire is the City of Pleasanton and surrounding cities. This analysis evaluates whether the impacts of the Housing Element Update, together with the impacts of cumulative development, would result in a cumulatively significant impact related to wildfire. This analysis then considers whether the proposed project's incremental contribution to cumulative impacts associated with the implementation of the proposed project would be significant. Both conditions must apply for a project's cumulative effects to rise to a level of significance.

Similar to the City of Pleasanton, the cities of Livermore, Dublin, and San Ramon are largely urbanized, generally outside the SRA and Very High FHSZs and include roads and other fuel breaks, emergency water sources, emergency utilities and maintenance of other infrastructure that would reduce impacts from wildfires. However, portions of the cities of Livermore, Dublin, San Ramon, and the Town of Danville are in Federal Responsibility Areas (FRAs) and in Very High FHSZ SRAs and LRAs. All cumulative projects, including the installation and/or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities), would be subject to fire protection development standards and be required to comply with County and City ordinances, General Plan policies, and plan review by the local fire departments to assist in protecting life and property in the event of a wildfire. Additionally, development projects, including the installation and maintenance of associated infrastructure, would be required to comply with all policies in the California Fire Code. Lastly, all cumulative projects, including the installation and maintenance of associated infrastructure, would be covered under existing emergency response plans. For these reasons, cumulative projects would not exacerbate wildfire risk or have any

significant cumulative impacts with respect to wildfire hazards. Therefore, cumulative impacts would be less than significant.

The proposed project's incremental contribution to the less than significant cumulative wildfire hazard impacts would not be cumulatively considerable. Development could result in an incremental increase in exposure of people and structures to wildland fires and associated hazards. However, the proposed project would not exacerbate any existing wildfire hazards because the degree of wildland fire hazard, including secondary hazards, would not substantially change with the development of the proposed project, and current hazards would not significantly increase, as described above. Additionally, the proposed project and all new development be required to comply with the fire protection measures identified in the General Plan, California Fire Code, and the California Public Resources Code.

Additionally, the proposed project would comply with applicable plans, policies, programs, and regulations as described above and would implement MM GEO-1, which would ensure project impacts related to wildfire would be less than significant. Thus, the proposed project's contribution to cumulative impacts would not be cumulatively considerable and would be less than significant.

Level of Cumulative Significance Before Mitigation

Less than significant impact.

Mitigation Measures

None.

CHAPTER 4: EFFECTS FOUND NOT TO BE SIGNIFICANT

4.1 - Introduction

This chapter is based on the Draft Environmental Impact Report (Draft EIR) Notice of Preparation (NOP), dated August 22, 2019, and contained in Appendix A of this EIR. The NOP was prepared to identify the potentially significant effects of the proposed project and was circulated for public review between August 22, 2019, and September 23, 2019. During the NOP evaluation, certain impacts were found to be less than significant because construction and operation of the proposed project would not result in such impacts.

This chapter provides a brief description of effects found not to be significant or less than significant, based on the NOP, NOP public comments received, or more detailed analysis conducted as part of the EIR preparation process. Note that a number of impacts that are found to be less than significant are addressed in the various EIR topical sections (Sections 3.1 through 3.16) to provide more comprehensive discussion of why impacts are less than significant in order to better inform decision-makers and the general public.

One public comment was received during the Draft Environmental Impact Report (EIR) NOP scoping period related to agriculture:

- Request to analyze impacts related to agricultural activities on Assessor's Parcel Number (APN) 941-26000-001-03 due to removal of access point.

4.2 - Environmental Effects Found not to be Significant

4.2.1 - Agriculture Resources and Forestry Resources

No Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as identified pursuant to the California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP) or forestland currently exist on the project site. A majority of the project site is mapped "Grazing Land" with a small portion of "Other Land," by the FMMP.[1] Therefore, the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. Additionally, the project site is not encumbered by a current Williamson Act Contract or zoned for forestland or timberland. Therefore, the proposed project would not conflict with a Williamson Act Contract or existing zoning for forestland or timberland and would not result in the loss or conversion of forestland to non-forest uses.[2]

Additionally, the project site is currently zoned unincorporated and prezoned Planned Unit Development–Low Density Residential, Agriculture, Open Space–Housing Opportunity Zone (PUD-

[1] California Department of Conservation (DOC). 2022. California Important Farmland Finder. Website: https://maps.conservation.ca.gov/dlrp/ciff/. Accessed January 30, 2025.
[2] California Department of Conservation (DOC). 2023. California Williamson Act Enrollment Finder. Website: https://maps.conservation.ca.gov/dlrp/WilliamsonAct/App/index.html. Accessed January 30, 2025.

LDR/A/OS-HOZ) by the City.[3] The proposed project would be consistent with the prezoning districts and would not conflict with existing zoning for agricultural use. The proposed project would also continue to provide access to APN 941-2600-1-3, located immediately west of the project site boundary, through an access easement. This easement would allow existing agricultural (grazing) activities to continue on the adjacent parcel upon project implementation. Therefore, no impact related to agriculture or forestry resources would occur.

4.2.1 - Mineral Resources

There are no mineral resource recovery sites on or near the project site.[4] Therefore, implementation of the proposed project would not result in loss of a locally important mineral resource recovery site delineated by an applicable land use plan.

A Mineral Land Classification map prepared by the DOC indicates that the project site is located in an area of inadequate information to warrant placement in any other mineral resource zone.[5] Furthermore, the project site is currently designated for Open Space- Public Health and Safety (OS–PH), LDR, and Open Space–Agriculture and Grazing (OS–AG) uses in the Pleasanton General Plan.[6] As such, the proposed project would not result in loss of availability of a known mineral resource of value to the region and residents of the State and no impact related to mineral resources would occur.

4.2.2 - Population and Housing

The project site is currently developed with two residential homes and related structures located in the southeastern corner. The proposed project includes demolition of the two homes and replacement with two new homes in the same approximate location. An additional 28 homes would be constructed in the central portion of the site on the north side of Devany Creek.

Approximately 43.85 acres of the site are currently designated for Residential–Low Density (R-LD) development in the Pleasanton General Plan, with a maximum density of 1.99 units per gross acre. This land use designation suggests General Plan buildout of up to 87 dwelling units, which indicates that the proposed development of 28 net lots was already accounted for in the Pleasanton General Plan EIR and would not represent an increase beyond current projections.

The project site was evaluated as Site 1 (Lester) in the City of Pleasanton 2023–2031 (6th Cycle) Housing Element Update (Housing Element Update) and associated Housing Element Update Program EIR. The Housing Element Update was adopted on January 20, 2023, and further revised in August 2023. The Housing Element Update proposed to zone the project site as PUD-LDR/A/OS/HOZ

[3] City of Pleasanton. 2023. Pleasanton General Plan 2005–2025: Land Use Map. Website: https://www.cityofpleasantonca.gov/assets/our-government/community-development/Land%20Use%20Element%20Map%202023.06.20.pdf. Accessed January 30, 2025.
[4] State of California Division of Mines and Geology (CDMG). 1982. Mineral Land Classification Map for Alameda and Contra Costa Counties. Website: https://maps.conservation.ca.gov/cgs/minerals/?page=All-Data#data_s=id%3AdataSource_335-18a47b5b8e5-layer-10-192c08351d6-layer-28%3A20. Accessed January 30, 2025.
[5] Ibid.
[6] City of Pleasanton. 2023. Pleasanton General Plan 2005–2025: Land Use Map. Website: https://www.cityofpleasantonca.gov/assets/our-government/community-development/Land%20Use%20Element%20Map%202023.06.20.pdf. Accessed January 30, 2025.

with a density range of 2 dwelling units per acre (du/acre). Therefore, the Housing Element Update assumed the project site could be developed with 31 dwelling units to support the City in meeting its Regional Housing Needs Assessment (RHNA) requirements.

Furthermore, the population of the City has declined since 2019, when the NOP for the Draft EIR was issued.[7] Therefore, proposed project implementation would not displace any individuals or significantly increase population and less than significant impacts related to population and housing would occur.

[7] United States Census Bureau. 2025. QuickFacts: Pleasanton City, California. Website: https://www.census.gov/quickfacts/fact/table/pleasantoncitycalifornia/PST045224. Accessed March 13, 2025.

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CHAPTER 5: OTHER CEQA CONSIDERATIONS

5.1 - Significant and Unavoidable Environmental Impacts

California Environmental Quality Act (CEQA) Guidelines Section 15126.2(a)(c) requires an Environmental Impact Report (EIR) to identify and focus on the significant environmental effects of the proposed project that cannot be avoided if the proposed project were implemented.

Based on the analyses contained in this Draft EIR, the City has determined that the proposed project in conjunction with other cumulative development in the southeast portion of the City would result in no cumulative-level significant and unavoidable impacts. However, based on the analyses, the only significant and unavoidable impact identified is related to Vehicle Miles Traveled (VMT).

5.2 - Growth-inducing Impacts

Public Resources Code Section 21100(b)(5) specifies that the growth-inducing impacts of a project must be addressed in an EIR. Section 15126.2(e) of the CEQA Guidelines provides the following guidance for assessing growth-inducing impacts of a project:

> Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in these are projects that would remove obstacles to population growth (a major expansion of a wastewater treatment plant, for example, could allow more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also, discuss the characteristics of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

There are two types of growth-inducing impacts that a project may have: direct and indirect. To assess the potential for growth-inducing impacts, the project's characteristics that may encourage and facilitate activities that individually or cumulatively may affect the environment must be evaluated (CEQA Guidelines § 15126.2(e)). CEQA Guidelines, as interpreted by the City, state that a significant growth-inducing impact may result if the project would:

- Induce substantial population growth in an area (for example, by proposing new homes and commercial or industrial businesses beyond the land use density/intensity envisioned in the general plan);
- Substantially alter the planned location, distribution, density, or growth rate of the population of an area; or
- Include extensions of roads or other infrastructure not assumed in the general plan or adopted capital improvements project list, when such infrastructure exceeds the needs of the project and could accommodate future developments.

Direct growth-inducing impacts occur when the development of a project imposes new burdens on a community by directly inducing unplanned population growth, or by leading to the construction of additional developments in the same area. Also included in this category are projects that remove physical obstacles to population growth (such as a new road into an undeveloped area or a wastewater treatment plant with excess capacity that could allow additional development in the service area). Construction of these types of infrastructure projects cannot be considered isolated from the development they facilitate and serve. Projects that physically remove obstacles to growth, or projects that indirectly induce growth may provide a catalyst for future unrelated development in an area such as a new residential community that requires additional commercial uses to support residents.

Growth inducement itself is not an environmental effect but may lead to foreseeable environmental effects. If substantial growth inducement occurs, it could result in secondary environmental effects, such as the demand for other community and public facilities or infrastructure, the construction of which could cause environmental effects; increased traffic and noise; degradation of air or water quality; degradation or loss of plant or animal habitats; and other effects.

The project site is located just outside the northwest edge of the City of Pleasanton city limits, but inside the City's Urban Growth Boundary (UGB) and is proposed for annexation into the City. Project implementation would directly induce growth into the City but not beyond that accounted for in the City of Pleasanton General Plan (General Plan). The United States Census Bureau estimated the total population of the City of Pleasanton at 79,804 as of July 1, 2025.[1] The proposed project would develop 28 single-family residential units and would be expected to result in a population of approximately 78 persons.[2] Conservatively assuming that all 78 residents would be new to the City, the proposed project's population would represent 0.10 percent of the total population of the City in July 2023. Therefore, direct population growth resulting from the project is considered negligible.

While urban infrastructure would be extended to 12.90 acres of the 128.50-acre development site, adjacent areas to the south and west would remain as permanent open space, thereby prohibiting further expansion. As such, development of the project would not remove a physical barrier to growth, and no impact would occur either directly or indirectly.

5.3 - Mandatory Findings of Significance

Public Resources Code Section 21083 and CEQA Guidelines Section 15065 requires lead agencies to make a finding of a "significant effect on the environment" if one or more of the following conditions exist:

1) A proposed project has the potential to degrade the quality of environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife species to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number

[1] California Department of Finance. 2025. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2025. Website: https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2025/. Accessed October 22, 2025.

[2] Calculation: 28 units X 2.77 persons per household in the City according to the United States Census Bureau = 77.56 persons

or restrict the range of a rare, or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.

2) The project has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals.

3) The possible effects of a project are individually limited but cumulatively considerable.

4) The environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly.

Finding No. 1: Less than significant impact with mitigation incorporated.

Based on the analysis provided in Section 3.3, Biological Resources, the proposed project's impacts related to special-status species and special-status natural communities and habitat would be less than significant with mitigation incorporated. Additionally, the proposed project's impacts on riparian habitat, a special-status species associated with riparian or wetland habitat, as well as wildlife corridors, would be less than significant with mitigation incorporated. Therefore, implementation of Mitigation Measure (MM) BIO-1a through MM BIO-1i would reduce impacts on special-status species. MM BIO-3 and MM BIO-5 would reduce impacts related to wetland habitats and tree removal.

With implementation of MM BIO-1a through MM BIO-1i, MM BIO-3, and MM BIO-5, the proposed project would not substantially degrade the quality of the environment, reduce fish or wildlife habitat, reduce fish or wildlife populations below self-sustaining levels, eliminate a plant or animal community, or reduce the number or range of a rare or endangered plant or animal.

Based on the analysis provided in Section 3.4, Cultural Resources and Tribal Cultural Resources, the proposed project's impacts related to California history or prehistory would be less than significant with mitigation incorporated. The implementation of MM CUL-2 would reduce impacts to prehistoric, historic, cultural, or Tribal Cultural Resources (TCRs) encountered during ground-breaking activities. Implementation of MM CUL-3 would reduce impacts to human remains that could be unearthed during excavation or grading activities.

With implementation of MM CUL-2 and MM CUL-3, the proposed project would not substantially degrade the quality of the environment or eliminate important examples of the major periods of California history or prehistory.

Based on the discussion provided above, compliance with required guidelines and statues and implementation of the mitigation measures, the proposed project would not substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of California history or prehistory. Therefore, impacts would be less than significant with the incorporation of MM BIO-1a through MM BIO-1g, MM BIO-3, MM BIO-5, MM CUL-2, and MM CUL-3.

Finding No. 2: Less than significant impact with mitigation incorporated.

As discussed in Section 3.12, Population and Housing, the proposed project would support the long-term goals, policies, and programs outlined in the City of Pleasanton's 2023–2031 Housing Element. The project contributes to the City's Regional Housing Needs Allocation (RHNA) for the 6th Cycle planning period and includes a percentage of residential units designated for lower-income households, consistent with State housing mandates. The project site is currently unincorporated and zoned as Planned Unit Development–Low Density Residential, Agriculture, and Open Space–Housing Opportunity Zone (PUD-LDR/A/OS-HOZ), as shown in the Housing Element Update. The proposed project would rezone the development site and open space from unincorporated to PUD-LDR/A/OS-HOZ, consistent with the zoning preestablished for the site. Additionally, pursuant to the City's Growth Management Ordinance (Pleasanton Municipal Code Chapter 17.36), the proposed project would require a Growth Management Allocation for the 28 proposed residential units. The project design is consistent with the proposed zoning changes and aligns with the zoning considered in the City's Housing Element Update

Additionally, this Draft EIR includes a review of the City of Pleasanton's long-term goals, policies, and actions across each environmental topic. The analysis concludes that the proposed project's immediate and cumulative impacts would be either less than significant or less than significant with the implementation of mitigation measures. Therefore, the proposed project would not advance short-term goals to the disadvantage of long-term goals.

Finding No. 3: Less than significant with mitigation incorporated.

The analysis presented in this Draft EIR includes a review of the proposed project's potential impacts related to air quality, biological resources, cultural resources, noise, and transportation, among other environmental issue areas. As presented throughout this Draft EIR, the proposed project's cumulative impacts would either be significant and unavoidable, less than significant with mitigation incorporated, less than significant, or there would be no impacts.

There would be less than significant cumulative impacts with regard to Air Quality, Noise, Public Services, Utilities and Service Systems, Recreation, Land Use, and Wildfire.

Potentially significant cumulative impacts related to Biological Resources, Cultural and Tribal Cultural Resources, Geology and Soils, and Hazards would be mitigated to less than significant levels with the implementation of MM BIO-1a through MM BIO-5; MM CUL-2 and MM CUL-3; MM GEO-1 and MM GEO-2a through MM GEO-2d; and MM HAZ-1.

Significant and unavoidable impacts would occur related to Transportation, specifically, VMT. The proposed project would result in a significant and unavoidable cumulative impact related to VMT, as it would conflict or be inconsistent with CEQA Guidelines Section 15064.3(b). No feasible mitigation was identified to reduce this impact to less than significant.

Finding No. 4: Less than significant impact with mitigation incorporated.

Compliance with and implementation of the proposed project's mitigation measures, along with adherence to applicable federal, State, and local regulations and the obtainment of required permits from the City of Pleasanton and other agencies, would ensure that construction and operation of the proposed project would not result in substantial adverse effects on human beings. This includes effects related to air quality, seismic and geologic hazards, exposure to hazardous materials, flooding, excessive noise and ground borne vibration, hazardous roadway features, inadequate emergency access, and wildfire-related risks. Therefore, the proposed project's impacts associated with directly or indirectly inducing substantial adverse effects on human beings would be less than significant.

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CHAPTER 6: ALTERNATIVES TO THE PROPOSED PROJECT

6.1 - Introduction

In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15126.6, this Draft Environmental Impact Report (Draft EIR) contains a comparative impact assessment of alternatives to the proposed project. The primary purpose of this section is to provide decision-makers and the general public with a reasonable number of feasible project alternatives that could attain most of the basic project objectives, while avoiding or reducing any of the project's significant adverse environmental effects. Important considerations for these alternatives analyses are noted below (as stated in CEQA Guidelines § 15126.6).

- An EIR need not consider every conceivable alternative to a project;
- An EIR should identify alternatives that were considered by the lead agency, but rejected as infeasible during the scoping process;
- Reasons for rejecting an alternative include:
  - Failure to meet most of the basic project objectives;
  - Infeasibility; or
  - Inability to avoid significant environmental effects.

6.1.1 - Significant Unavoidable Impacts

The proposed project would result in the following significant unavoidable impact:

- **Project-level Vehicle Miles Traveled:** The proposed project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

6.1.2 - Less Than Significant Impacts with Mitigation

The proposed project would result in less than significant impacts with mitigation incorporated for the following environmental topic areas:

- Aesthetics
  - Impact AES-4: Creation of Substantial Light and Glare
- Air Quality
  - Impact AIR-1: Consistency with Air Quality Management Plan
- Biological Resources
  - Impact BIO-1: Special-status Species
  - Impact BIO-2: Sensitive Natural Communities or Riparian Habitat
  - Impact BIO-3: Wetlands and Jurisdictional Features
  - Impact BIO-5: Local Policies or Ordinances
- Cultural Resources and Tribal Cultural Resources

  - Impact CUL-2: Archaeological Resources
  - Impact CUL-3: Human Remains
  - Impact CUL-4: Listed or Eligible Tribal Cultural Resources
  - Impact CUL-5: Lead Agency Determined Tribal Cultural Resources
- Geology, Soils, and Seismicity
  - Impact GEO-1: Earthquakes
  - Impact GEO-3: Unstable Geologic Units or Soils
  - Impact GEO-4: Expansive Soils
  - Impact GEO-6: Paleontological Resources
- Hazards and Hazardous Materials
  - Impact HAZ-1: Routine Transport, Use, or Disposal of Hazardous Materials/Risk of Upset
- Wildfire
  - Impact WILD-4: Exposure to Flooding or Landslide Risks from Runoff, Post-Fire Slope Instability, or Drainage Changes

6.1.3 - Project Objectives

As stated in Chapter 2, Project Description, the objectives of the proposed project are to:

- Provide a well-designed residential neighborhood with a strong sense of community and connection with adjacent open space;
- Encourage redevelopment of underused sites containing available infrastructure as identified in the Pleasanton General Plan Housing Element;
- Develop a residential community consistent with Measures PP and QQ;
- Provide open space areas across the project site and dedicate land to the EBRPD to be permanently preserved;
- Provide public access, including a public parking/staging area and a trail connection, to Pleasanton Ridge;
- Preserve the open space character at the edges of the City, in accordance with the City of Pleasanton General Plan Community Character Element; and
- Improve Dublin Canyon Road to increase access and safety by constructing roadways, sidewalks, and bike lanes.

6.2 - Alternatives to the Proposed Project

The three alternatives to the proposed project analyzed in this section are as follows:

- **Alternative 1–No Project/No Build Alternative:** Under the No Project/No Build Alternative (Alternative 1), the proposed project would not be constructed. Instead, it is assumed that under this alternative, existing operations on the project site would continue at the capacity of existing on-site buildings and infrastructure. No new development would occur.

- **Alternative 2–No Project/Existing Zoning Alternative:** Under the No Project/Existing Zoning Alternative (Alternative 2), the project site would be redeveloped with uses allowed by-right for the existing zoning districts on each parcel. This alternative would not include annexation of the project site into the City. As such, permitted development would be subject to the County's zoning code. On the project site, each of the five existing parcels is currently allowed to develop one single-family dwelling unit. Additionally, since Accessor's Parcel Number (APN) 941-2600-002-6 is over 25 acres in size, the development of a secondary dwelling unit is permitted. Thus, this alternative would result in the development of 5 total dwelling units and 1 secondary dwelling unit. No dedication of land to the East Bay Regional Park District (EBRPD), parking improvements, or improvements to the Oak Hills Congregational Church access would occur.

- **Alternative 3–Alternative Site:** The Alternative Site Alternative (Alternative 3) would utilize a different project site based on the sites identified in the City of Pleasanton 2023-2031 Housing Element Sites Inventory. Site 26 – St. Augustine (Site 26) was selected as the alternative site due to its potential to accommodate 28 residential units and the absence of any other entitlement applications submitted for the alternative site. Rezoning of Site 26 would be required. Alternative 3 would include construction of 28 new detached single-family residential units, which is the same amount of housing units as the proposed project. Operations are anticipated to be the same as the proposed project. Because of its location, Alternative 3 would not implement a new public trailhead, traffic signal, water pump, and road improvements. Additionally, redevelopment of the existing two single-family homes located on the northeastern portion of the project site would not occur, and the annexation of the 2.5-acre church site and associated parking lots would not be required.

The three alternatives to the proposed project are analyzed below. These analyses compare the proposed project and each individual project alternative. In several cases, the description of the impact may be the same under each alternative when compared with the CEQA Thresholds of Significance (i.e., both the project and the alternative would result in a less than significant impact). The actual degree of impact may be slightly different between the proposed project and each alternative, and this relative difference is the basis for a conclusion of greater or lesser impacts.

6.3 - Alternative 1—No Project/No Build Alternative

CEQA Guidelines Section 15126.6(e) requires EIRs to evaluate a "No Project" Alternative which is defined as the "circumstances under which the project does not proceed." The purpose of the No Project Alternative is to allow decision-makers and the public to compare the potential environmental impacts generated from the proposed project with the existing environmental impacts associated with not approving the proposed project. Under the No Project/No Build Alternative (Alternative 1), the proposed project would not be developed, and the project site would

remain in an as-is condition. No improvements to existing on-site structures would occur, and no development is anticipated under Alternative 1. Under Alternative 1, no trees would be removed or impacted, and no construction or ground-disturbing activities would occur. Further, the project site would not be annexed into the City and no off-site improvements (including parking lot improvements on the church site) would be implemented.

Under this Alternative, the project site would remain largely undeveloped. The two existing residences would remain in their current condition. Under this alternative, the five APNs associated with the project site would maintain their existing General Plan Land Use and Zoning as provided in Chapter 2, Project Description, Exhibit 2-4.

6.3.1 - Impact Analysis

Aesthetics, Light, and Glare

As noted in Section 3.1, Aesthetics, Light, and Glare, the proposed project's impacts related to scenic vistas, scenic resources, existing visual character, and quality of public views of the site and its surroundings would be less than significant without mitigation. Cumulative impacts would be less than significant without mitigation. Impacts related to light and glare for the proposed project would be less than significant with implementation of Mitigation Measure (MM) AES-4a.

Under Alternative 1, no construction would occur, and scenic views from locally designated panoramic viewpoints and scenic corridors would not be temporarily altered. No scenic resources on the project site, such as existing trees would be removed, and existing structures and other features would remain and continue to be incorporated into locally designated scenic views. The project site would maintain its existing zoning, and existing sources of stationery and mobile lighting and glare would remain. Therefore, no impact would occur, and Alternative 1 would reduce impacts related to aesthetics, light, and glare when compared to the proposed project.

Agriculture Resources and Forestry Resources

As noted in Chapter 4, Effects Found not to be Significant, Section 4.2.1, Agriculture Resources and Forestry Resources, the proposed project would have no impacts related to agriculture resources and forestry resources; there would be no cumulative impacts.

The project site's General Plan land use and zoning allow agricultural use. According to the California Department of Conservation (DOC) Important Farmland Finder, the project site not designated as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland.[1] Furthermore, no forested land, timberland, or timberland production zones are located on the project site or in the surrounding area.[2] Therefore, Alternative 1 would have no impact on Agriculture Resources and Forestry Resources, similar to the prepared project.

[1] California Department of Conservation (DOC). Important Farmland Finder. Website: https://maps.conservation.ca.gov/dlrp/ciff/ Accessed September 24,2025.

[2] California Department of Forestry and Fire Protection (CAL FIRE). Forest Practice GIS Map. Website: https://forest-practice-calfire-forestry.hub.arcgis.com/apps/9d589c3af194465a8556b0305730b0c7/explore. Accessed September 24, 2025.

Air Quality

As noted in Section 3.2, Air Quality, the proposed project's impacts related to objectionable odors exposure, cumulative criteria pollutant emissions impacts, sensitive receptors exposure to pollutant concentrations, and cumulative impacts would be less than significant without mitigation. Impacts related to consistency with an air quality management plan would be less than significant with mitigation incorporated.

Construction

Under Alternative 1, no construction or ground-disturbing activities would occur; accordingly, impacts related to air quality from construction activities would be reduced compared to the proposed project. Construction-related air quality impacts from the proposed project were determined to be less than significant. There would be no impact on air quality under Alternative 1, as no construction would occur, meaning no emissions of criteria pollutants, toxic air contaminants, or dust from activities such as grading, demolition, or building, and all thresholds related to construction air quality would be met. As such, both regional air quality impacts and localized air quality impacts from construction would be reduced under Alternative 1.

Operation

Under Alternative 1, the project site would remain unincorporated and grazing operations would continue. Operation-related air quality impacts from the proposed project were determined to be less than significant. Operational emissions from project-generated vehicle trips, energy use, and other activities would be reduced compared to the proposed project. The existing two residential homes were previously accounted for in the 2017 Clean Air Plan. As such, this alternative would result in a reduced impact related to air quality management plan consistency.

However, while the Alternative 1 would reduce emissions in comparison to the proposed project, it would not eliminate them. The existing residential uses would continue to operate and generate mobile source emissions from visitors and residents traveling to and from the area. These emissions would persist and should be considered. As such, the Alternative 1 would result in a less than significant impact with respect to operational air quality emissions.

Biological Resources

As noted in Section 3.4, Biological Resources, the proposed project would have no impact on an approved Habitat Conservation Plan, and a less than significant impact without mitigation related to fish and wildlife movement corridors. The proposed project would have a less than significant impact with mitigation incorporated related to special-status species, sensitive natural communities or riparian habitat, wetlands and jurisdictional features, local policies or ordinances, and cumulative impacts.

Under Alternative 1, no construction would occur, and all existing habitats would remain preserved. As such, the existing California annual grassland habitat would continue to provide nesting opportunities for migratory wildlife or nursey sites. Because of this, no wildlife disturbance would occur, and impacts would be further reduced as compared to the proposed project. While no sensitive natural communities fall within the project boundaries, seasonal wetlands do occur on the northern portion of the site, and the United States Army Corps of Engineers (USACE) accepted all

features on-site as under their jurisdiction. Under Alternative 1, no impact to seasonal wetlands would occur. Additionally, the project site is not located within the jurisdiction of an existing Habitat Conservation Plan or other approved local regulations; therefore, no impact would occur. Since Alternative 1 does not include construction, there would be no impact on Biological Resources, and impacts would be reduced as compared to the proposed project.

Cultural Resources and Tribal Cultural Resources

As noted in Section 3.4, Cultural Resources and Tribal Cultural Resources, the proposed project would have no impact on historical resources. The proposed project would have a less than significant impact, with mitigation incorporated, on human remains, archaeological resources, and Tribal Cultural Resources (TCRs).

Under Alternative 1, no construction or ground-disturbing activities would occur, leaving any potential archaeological resources, human remains, and potential TCRs in the ground and undisturbed. Accordingly, no impact to cultural resources or TCRs would occur, and impacts would be reduced as compared to the proposed project.

Energy

As noted in Section 3.5, Energy, the proposed project's impacts related to energy would be less than significant.

Under Alternative 1, no temporary on or off-site energy usage from construction activities or unnecessary consumption of energy resources would occur. Since the project site currently remains largely undeveloped, there would be less than significant impact to Energy, and construction-related and operational impacts related to energy would be reduced in comparison to the proposed project.

Geology, Soils, and Seismicity

As noted in Section 3.6, Geology, Soils, and Seismicity, the proposed project would have no impact related to the use of septic tanks or alternative wastewater disposal systems. The proposed project's impact related to soil erosion, or the loss of topsoil would be less than significant. The proposed project's impacts related to the risk of loss, injury or death involving seismic hazards, as well as expansive soil, liquefaction, and paleontological resources would be less than significant with mitigation. The proposed project's cumulative impact would be less than significant without mitigation.

Since Alternative 1 does not involve the construction of new structures or any ground-disturbing activities, it would not result in impacts related to alternative wastewater disposal systems, significant paleontological resources, soil erosion or loss of topsoil, expansive soils, or unstable subsurface conditions. Therefore, due to the absence of construction or ground-disturbing activities under this alternative, no impacts to geology, soils, and seismicity would occur and impacts would be reduced as compared to the proposed project.

Greenhouse Gas Emissions

As noted in Section 3.7, Greenhouse Gas Emissions, the proposed project would have a less than significant impact without mitigation incorporated related to conflicting with an adopted greenhouse gas (GHG) emission-reducing plan, GHG emissions, and cumulative impacts.

Alternative 1 would not involve any on- or off-site construction activities. Therefore, construction-related GHG emissions would not be released, and no construction-related impacts would occur. However, the project site currently contains two single-family residences, which would continue to operate under this alternative. These existing uses would generate ongoing operational GHG emissions, including from mobile sources such as vehicle trips. Therefore, Alternative 1 would result in a less than significant impact with respect to operational GHG emission and due to the lesser scale of existing uses, impacts would be greatly reduced as compared to the proposed project.

Hazards and Hazardous Material

As discussed in Section 3.8, Hazards and Hazardous Materials, the proposed project would have no impact related to proximity to a public airport safety hazard. The proposed project's impacts related to hazardous materials upset risk, hazardous emissions proximate to a school, emergency response and evacuation, wildland fires, and cumulative impacts would be less than significant without mitigation. The proposed project's impacts related to the disposal of hazardous materials during excavation and construction from potentially contaminated materials, would be reduced to less than significant levels with mitigation incorporated.

Alternative 1 would not require the use, transport, or disposal of potentially hazardous materials typically associated with construction activities. The proposed project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Currently, the project site is undeveloped, except for two residential homes and related structures built prior to 1918 and 1966. Asbestos is a concern during demolition of structures that were built prior to 1980 which would be required for the proposed project. Products such as vinyl asbestos tiles, asbestos cement, or other building materials containing asbestos can be expected to occur in buildings constructed prior to the 1970s, when the United States Environmental Protection Agency (EPA) began to impose bans on certain uses of asbestos. Under Alternative 1, the homes and associated structures would remain undemolished and would therefore removal and disposal of asbestos-containing materials would not occur. Therefore, no construction-related impacts would occur.

Under Alternative 1, existing uses on the project site would continue under existing conditions. These uses are not anticipated to involve the routine use, storage, or disposal of hazardous materials. As such, there would be no impact related to operational hazards. Overall, this alternative would result in no impact related to construction and operational hazardous materials, and impacts would be reduced as compared to the proposed project.

Hydrology and Water Quality

As noted in Section 3.9, Hydrology and Water Quality, the proposed project's impacts related to surface and groundwater quality during construction and operation, groundwater supply/recharge,

risk of pollutant release due to project site inundation, water quality control or sustainable groundwater management plans consistency, erosion/siltation, additional sources of polluted runoff, exceedance of storm drainage capacity resulting in flooding, and impedance of flood flows from alterations to the existing drainage pattern of the site, and cumulative impacts would be less than significant without mitigation.

Since Alternative 1 would not require construction or ground-disturbing activities, there would be no impact with respect to hydrology and water quality during construction. Given that the project site is mostly undeveloped, and all naturally existing drainage patterns and pre-existing stormwater infrastructure along Dublin Canyon Road would remain the same, operation of the project site under this alternative would not result in impacts to hydrology and water quality. No inundation would occur under this alternative, as the project site is not located in any flood zones or is in proximity to any large bodies of water. Since no construction activities would occur and Alternative 1 would continue to utilize the existing stormwater drainage system, there would be no impact to hydrology and water quality, and impacts would be reduced as compared to the proposed project.

Land Use and Planning

As noted in Section 3.10, Land Use and Planning, the proposed project's impacts related to physically dividing an established community, conflicting with applicable plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect, and cumulative impacts would be less than significant without mitigation.

Under Alternative 1, no construction activities would occur, and no linear features would be developed that would physically divide an established community. In addition, Alternative 1 would not alter the existing land use designation in the General Plan, along with the associated land use regulations. Since Alternative 1 does not require construction activities or land use changes, there would be no impacts related to land use. As existing uses consistent with the project site's General Plan land use and zoning would remain in place, no impact would occur related to conflicting with a land use plan, policy, or regulation adopted to mitigate an environmental effect, and impacts would be reduced as compared to the proposed project.

Mineral Resources

As noted in Chapter 4, Effects Found not to be Significant, Section 4.2.2, Mineral Resources, the proposed project would have no impacts related to mineral resources; there would be no cumulative impacts.

No mineral resource zones of regional or statewide importance are located in the City of Pleasanton or are delineated in any local land use plans.[3] Mineral Land Classification map prepared by the DOC indicates that the project site is located in an area of inadequate information to warrant placement in any other mineral resource zone. Furthermore, the project site does not contain land designated for mineral resource recovery or similar uses. As such, Alternative 1 would not result in loss of

[3] California Department of Conservation. (DOC). CGS Information Warehouse: Mineral Land Classification Maps. Website: https://maps-cadoc.opendata.arcgis.com/maps/58f2971975cd4fcd98300c7c233d4f99/about. Accessed September 26, 2025.

availability of a known mineral resource of value to the region and residents of the State during construction. Therefore, Alternative 1 would result in no impact related to Mineral Resources.

Noise

As noted in Section 3.11, Noise, the proposed project would have no impact related to exposing people to excessive noise levels within the vicinity of a private airstrip or an airport land use plan or within two miles of an airport. The proposed project would have a less than significant impact without mitigation related to substantial noise increase in excess of standards and groundborne vibration and noise levels, and cumulative impacts.

Since Alternative 1 would not require construction or associated ground disturbance, there would be no construction-related impacts with respect to substantially exceeding applicable standards for temporary or permanent noise levels, generating excessive groundborne vibrations, excessive noise levels within the vicinity of a public airport or airport land use plan, and cumulative impacts resulting in reduced impacts related to noise compared to the proposed project.

At operation, Alternative 1 would continue to generate noise levels similar to those at existing conditions. Alternative 1 would remain constant with existing traffic levels, and the number of daily vehicle trips and associated noise would be notably reduced as compared to the proposed project. Furthermore, no permanent sources of groundborne vibrations exist on the project site or surrounding area, and the project site is not located within the vicinity of a public airport or airport land use plan. Since stationary noise source would remain constant with existing conditions, mobile noise levels generated by traffic would not be doubled, and no permanent sources of groundborne vibrations exist within the project vicinity, Alternative 1 would have a less than significant impact with respect to substantially exceeding applicable standards for temporary or permanent noise levels, generating excessive groundborne vibrations, and cumulative impacts. Impacts related to excessive noise levels within the vicinity of a public airport or airport land use plan would have no impact. As such, impacts related to operational noise would be reduced as compared to the proposed project.

Population and Housing

As noted in Chapter 4, Effects Found not to be Significant, Section 4.2.3, Population and Housing, with respect to population growth, housing displacement and cumulative impacts, the proposed project would have a less than significant impact without mitigation.

Under this alternative, no residential uses would be developed, and no direct increase in population on the project site would occur. Further, no extension of roadways or infrastructure would be constructed that could indirectly induce unplanned population growth. Impacts associated with direct and indirect population growth would be reduced as compared to the proposed project. Like the proposed project, Alternative 1 would have no impact related to the displacement of existing people or housing.

Public Services

As noted in Section 3.12, Public Services, the proposed project would have no impact on public services. The proposed project would have a less than significant impact without mitigation in regard to fire protection facilities, police protection facilities, school facilities, library facilities, and cumulative impacts.

Under this alternative, no temporary construction or ground disturbance activities would occur that could interfere with emergency response times or performance objectives. Alternative 1 would operate under the same land use regulations as existing conditions and would not include new residential units or an increase in population that would increase demand for existing public services or necessitate the construction of new or expanded facilities. Impacts related to public services and recreation would be reduced as compared to the proposed project.

Recreation

As noted in Section 3.13, Recreation, the proposed project would have a less than significant impact without mitigation regarding increased usage of existing parks and recreational facilities, the construction or expansion of recreational facilities, and cumulative impacts.

Under Alternative 1, no residential development or recreational facilities would be constructed on the project site, which would continue to be occupied by two single-family homes. The site itself does not contain any existing State, regional, or City parks, recreational facilities, or designated open spaces, but the surrounding area is well-served by a variety of recreational resources, including Mount Diablo State Park and 17 City parks and recreational facilities within 3 miles of the site. Because this alternative would not result in population growth or increased demand for parks and recreational facilities, there would be no impact to recreation resources, as existing facilities would continue to serve the current population and no substantial physical deterioration or adverse environmental effects related to recreation would occur. However, under Alternative 1, the western portion of the project site would not be dedicated to the EBRPD for conservation, and no improvements to the EBRPD trailhead and parking area on the eastern portion of the project site would occur. Therefore, beneficial improvements to the regional parks system and associated recreational facilities would not occur as under the proposed project.

Transportation

As noted in Section 3.14, Transportation, the proposed project's impacts related to roadway safety hazards, emergency access, and bicycle, pedestrian, and transit facilities would be less than significant without mitigation. The proposed project's impacts related to Vehicle Miles Traveled (VMT) and cumulative impacts would be significant and unavoidable.

No construction activities would occur and no new on-site roadways, bicycle, or pedestrian facilities, or off-site pedestrian facilities would be constructed, and no hazardous geometric design features, incompatible uses, or features exacerbating inadequate emergency access would be implemented. The project site would continue to be served by existing transit facilities serving the City and County, including Bay Area Rapid Transit (BART) and Alameda Contra Costa Transit Authority District (AC Transit).

During operations, Alternative 1 would result in a reduced number of vehicle trips as compared to the proposed project, due to the limited scale of existing development. However, as noted in Appendix H, the existing VMT per resident for the existing conditions on the project site in Alameda County currently exceeds the impact threshold. Thus, under Alternative 1, there would still be a significant and unavoidable impact as the existing VMT per resident is anticipated to be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). Therefore, Alternative 1 would have no impact related to roadway safety hazards, emergency access, and bicycle, pedestrian, and transit facilities, but the impacts related to VMT would be significant and unavoidable. This alternative would have a similar impact to VMT as the proposed project, but a reduced impact related to roadway safety hazards, emergency access, and bicycle, pedestrian, and transit facilities.

Utilities and Service Systems

As noted in Section 3.15, Utilities and Service Systems, the proposed project's impacts related to water supply or conveyance facilities, wastewater treatment or conveyance facilities, stormwater drainage facilities, natural gas, electric power, telecommunications facilities, landfill capacity, consistency with solid waste regulations, and cumulative impacts would be less than significant without mitigation.

Under Alternative 1 , existing uses would continue to be served by surrounding utility providers that are already accounted for in those service providers planning and capacity projections. As a result, existing uses under the Alternative 1 have not contributed to generating a substantial amount of wastewater or solid waste that would exceed the existing capacity of regional wastewater treatment facilities or landfills. As the project site is mostly undeveloped, with the exception of two single-family residences, there would be no impacts related to utilities and service systems, and impacts would be lessened under the Alternative 1 as compared to the proposed project.

Wildfire

As noted in Section 3.16, Wildfire, the proposed project's impacts related to impairment of an emergency response plan or emergency evacuation plan, exposing project occupants to pollutant concentrations from wildfire, and installation or maintenance of infrastructure that exacerbates fire risk, would be less than significant without mitigation. The proposed project's impacts related to flooding and landslide hazards due to post-fire slope instability or drainage changes would be less than significant with implementation of MM GEO-1. The proposed project's incremental contribution to the less than significant cumulative wildfire hazard impacts was found to not be considerable.

Under Alternative 1, no construction would occur on the project site and therefore no new infrastructure that could exacerbate wildfire risk would be developed. Surrounding land uses are largely also undeveloped. According to CAL FIRE, the entirety of the project site is located in a High Fire Hazard Severity Zone (FHSZ) within a State Responsibility Area (SRA).[4] Additionally, the City's General Plan Figure 5-1 indicates the project site is within an earthquake-induced landslide zone. Wildfire has not recently occurred on the project site and, therefore, does not have a slope-related

[4] California Department of Forestry and Fire Protection (CAL FIRE). Fire Hazard Severity Zone Map Viewer. Website: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones. Accessed September 26, 2025.

instability risk related to wildfire. While development could result in an incremental increase in exposure to wildland fires and associated hazards, the proposed project would not exacerbate any existing wildfire hazards. Under Alternative 1, no construction nor operational related impacts related to wildfire would occur. As such, the alternative would have a reduced impact related to wildfire in comparison to the proposed project.

6.3.2 - Conclusion

Under the Alternative 1, no construction or ground-disturbing activities would occur, and no physical changes would be made to the project site. Existing land uses and conditions would be preserved, with no new residential development, infrastructure, or annexation. As a result, Alternative would avoid or reduce impacts associated with aesthetics, light and glare, agriculture resources and forestry resources, air quality (including operational emissions), biological resources, cultural resources and Tribal cultural resources, energy, geology, soils and seismicity, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use, noise, population and housing, public services, recreation, transportation, utilities and service systems, and wildfire, when compared to the proposed project. The site would remain largely undeveloped, preserving open space, biological resources, and current land use designations, and would not contribute to increased air emissions, noise, traffic, utility demand, or wildfire risk.

However, Alternative 1 would not accomplish any of the proposed project's objectives discussed in Section 6.1.3 above. Alternative 1 would not develop any residential units and, in turn would not provide a well-designed neighborhood or residential community and would not further the General Plan goals related to infill development. This alternative would not provide public access to the Pleasanton Ridge trail connection. On-site open space amenities, pedestrian, or bicycle facilities would not be constructed. Further, improvements to Dublin Canyon Road would not occur. Accordingly, this alternative would not satisfy any of the project objectives.

6.4 - Alternative 2—No Project, Existing Zoning

Under Alternative 2, development of the proposed project would not occur. Rather, the project site would be redeveloped with uses allowed by-right for the existing zoning of each parcel. This alternative would not include annexation of the project site into the City; as such, permitted development would be subject to the County's zoning code.

The zoning district established by the County for the five existing parcels on the project site is A (see Chapter 2, Project Description, Exhibit 2-5). Under this zoning district, each parcel on the project site is allowed to develop one single-family dwelling unit.[5] Additionally, since APN 941-2600-002-6 is over 25 acres in size, the development of a secondary dwelling unit is permitted. Thus, this alternative would result in a total of 6 dwelling units on the project site, including the development of 3 additional dwelling units and 1 secondary dwelling unit as follows:

- APN941-2500-2, 2 existing single-family residences to remain

[5] Alameda County. Alameda County Zoning Code Chapter 17.06.030. Website: https://library.municode.com/ca/alameda_county/codes/code_of_ordinances?nodeId=TIT17ZO_CH17.06ADI. Accessed October 8, 2025.

- APN 941-2700-2, 1 new single-family dwelling unit
- APN 941-2500-3, 1 new single-family dwelling unit
- APN 941-2600-2-6, 1 new single-family dwelling unit and 1 secondary dwelling unit

Under this alternative, no dedication of land to the EBRPD, trail or parking improvements, off-site roadway improvements (including bike lanes and traffic signals), or improvements to the Oak Hills Congregational Church access would occur.

6.4.1 - Impact Analysis

Aesthetics, Light, and Glare

As noted in Section 3.1, Aesthetics, Light, and Glare, the proposed project's impacts related to scenic vistas, scenic resources, existing visual character, and quality of public views of the site and its surroundings would be less than significant without mitigation. Cumulative impacts would be less than significant without mitigation. Impacts related to aesthetics, light, and glare for the proposed project would be less than significant with implementation of MM AES-4a.

Alternative 2 would be constructed on the same project site as the proposed project, but would develop fewer residential units, resulting in reduced construction activities as compared to the proposed project. Construction activities, including demolition and grading, may temporarily affect scenic views from distant panoramic viewpoints and scenic corridors. However, the project site is not visible from any designated State Scenic Highway, and views would remain consistent with the existing setting. Therefore, impacts on scenic vistas and scenic resources would be less than significant.

Under Alternative 2, scenic resources on the project site, such as existing trees, would be removed. The existing single-family structures and other features would remain and continue to be incorporated into locally designated scenic views.

Once constructed, Alternative 2 would introduce 3 new single-family dwelling units and 1 secondary dwelling unit with associated roadways and infrastructure on the project site. Existing sources of stationery and mobile lighting, and glare would remain, and new sources would be introduced under Alternative 2. However as with the proposed project, to ensure design compatibility, Alternative 2 would implement mitigation measures to ensure a less than significant impact. Furthermore, the alternative would follow all development standards, comply with the County's regulations, and undergo review by the Planning Commission. Therefore, similar to the proposed project, there would be less than significant impacts related to aesthetics, light, and glare, but due to the lesser intensity of development, potential impacts would be reduced as compared to the proposed project.

Agriculture Resources and Forestry Resources

As noted in Chapter 4, Effects Found not to be Significant, Section 4.2.1, Agriculture Resources and Forestry Resources, the proposed project would have no impacts related to agriculture resources and forestry resources; there would be no cumulative impacts.

The project site and surrounding area are primarily undeveloped, surrounded by rural development, and has a current land use and zoning of Agriculture. According to the DOC Important Farmland Finder, the project site is not designated as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland. Furthermore, no forested land, timberland, or timberland production zones are located on the project site or in the surrounding area. Redevelopment under Alternative 2 would occur within existing zoning and would not result in the loss of Prime, Statewide Important, or Unique Farmland. No forest or timber resources would be affected. Agricultural use would remain permitted under the existing zoning, and the limited residential development allowed would not substantially affect agriculture resources and forestry resources. Therefore, the Alternative 2 would have no impact on Agriculture Resources and Forestry Resources, similar to the proposed project.

Air Quality

As noted in Section 3.2, Air Quality, the proposed project's impacts related to objectionable odors exposure, cumulative criteria pollutant emissions impacts, sensitive receptors exposure to pollutant concentrations, and cumulative impacts would be less than significant without mitigation. Impacts related to consistency with an air quality management plan would be less than significant with mitigation incorporated.

Construction

Construction of Alternative 2 would involve demolition, ground disturbance, and off-site transport of materials, potentially generating objectionable odors, criteria air pollutants, fugitive dust, and diesel particulate matter (DPM). Odors from exhaust would be temporary and highly diffusive, resulting in a less significant impact. However, prior to mitigation, increased fugitive dust and DPM could conflict with the 2017 Clean Air Plan, contribute to a cumulatively considerable increase in nonattainment pollutants, and expose nearby sensitive receptors to elevated toxic air contaminant (TAC) levels. Therefore, construction would have a potentially significant impact on air quality. With implementation of mitigation measures, similar to those proposed for the main project, these impacts would be reduced to less than significant.

However, given its reduced development density, Alternative 2 would involve a lower intensity and shorter construction period than the proposed project, resulting in a proportionate reduction in air quality emissions. As a result, Alternative 2 would have reduced construction-related air quality impacts compared to the proposed project.

Operation

Alternative 2 would generate similar types of criteria pollutants as the proposed project due to its residential use. However, due to the reduced unit count, the overall operational emissions would be lower. Like the proposed project, Alternative 2 would not exceed Bay Area Air District significance thresholds or conflict with the 2017 Clean Air Plan. Therefore, operational air quality impacts would be less than significant without mitigation.

Although emissions would be reduced, Alternative 2 would still contribute to regional nonattainment pollutants. These contributions, however, would remain less than significant without mitigation, consistent with the proposed project. There are no nearby sensitive receptors—such as preschools,

residences, and senior facilities—that could be exposed to TACs from vehicle exhaust. Since residential uses primarily involve gasoline-fueled vehicles and Alternative 2 would operate at a lower density, TAC-related impacts would be less than significant, and reduced as compared to the proposed project.

Objectionable odors are typically associated with industrial or waste-related uses. As Alternative 2 would involve residential development, it would not introduce new odor sources. Similar to the proposed project, odor impacts would be less than significant without mitigation.

Overall, under Alternative 2, Air Quality impacts would be reduced due to the decreased density, compared to the proposed project.

Biological Resources

As noted in Section 3.4, Biological Resources, the proposed project would have no impact on an approved Habitat Conservation Plan. The proposed project would have a less than significant impact without mitigation related to fish and wildlife movement corridors. The proposed project would have a less than significant impact with mitigation incorporated related to special-status species, sensitive natural communities or riparian habitat, wetlands and jurisdictional features, local policies or ordinances, and cumulative impacts.

Under Alternative 2, construction would involve demolition, ground disturbance, and removal of ornamental landscaping, similar to the proposed project. The project site does contain sensitive natural communities, wetlands, and jurisdictional features. As such, MM BIO-3 would be required to ensure development within the project site does not impact these features. No known habitat conservation plans are known to be in effect for the project site and, as such, no conflicts with habitat conservation plans would occur. Tree removals associated with new residential development would be subject to the County's tree protection ordinance, which requires permits for removal of larger or protected trees. Following compliance with the established ordinance, impacts on biological resources would be less than significant without mitigation.

However, removal of trees and landscaping could affect marginal nesting habitat for migratory birds and special-status species. As with the proposed project, these impacts would be potentially significant during construction and would require mitigation, such as pre-construction surveys and avoidance measures for nesting birds and special-status wildlife. With implementation of standard mitigation measures, overall biological resource impacts would be less than significant.

Because Alternative 2 would result in substantially less development and ground disturbance compared to the proposed project, and would not include public improvements, the scale of biological resource impacts would be reduced as compared to the proposed project. The limited number of new residences and absence of major infrastructure would minimize habitat loss and disturbance. Therefore, biological resource impacts under Alternative 2 would be reduced as compared to the proposed project.

Cultural Resources and Tribal Cultural Resources

As noted in Section 3.4, Cultural Resources and Tribal Cultural Resources, the proposed project would have no impact on historical resources. The proposed project would have a less than significant impact, with mitigation incorporated, on human remains, archaeological resources, cultural resources, and TCRs.

Compared to the proposed project, Alternative 2 would involve less ground disturbance, resulting in a lower likelihood of encountering historical, archaeological, human remains, or TCRs. However, ground disturbance could uncover previously unknown resources. With mitigation measures in place, this impact would be reduced to a less than significant level similar to the proposed project. Because of the reduced ground disturbance, the overall potential impact under Alternative 2 would be less than that of the proposed project.

Energy

As noted in Section 3.5, Energy, the proposed project's impacts related to energy would be less than significant.

Construction

Construction activities under Alternative 2 include demolition, grading, and equipment transport, would rely primarily on petroleum-based fuels. However, due to the reduced scale of Alternative 2 construction would likely require fewer resources, less equipment, and a shorter duration than the proposed project, resulting in lower energy consumption. Therefore, construction-related impacts would be less than significant, but reduced as compared to the proposed project.

Operation

During operation, energy use would also be lower due to fewer residential units and occupants. Like the proposed project, Alternative 2 would be subject to all applicable State and Local energy-efficient standards.

Overall, Alternative 2 would consume less energy during both construction and operation phases. Impacts related to energy use and potential conflicts with renewable energy or efficiency plans would be less than significant without mitigation, like the proposed project.

Under the proposed project, there would be a less than significant impact related to energy. Because of the reduced development intensity of Alternative 2, this alternative would result in energy impacts during construction and operation that are reduced as compared to the proposed project.

Geology, Soils, and Seismicity

As noted in Section 3.6, Geology, Soils, and Seismicity, the proposed project would have no impact related to the use of septic tanks or alternative wastewater disposal systems. The proposed project's impact related to soil erosion, or the loss of topsoil would be less than significant. The proposed project's impacts related to the risk of loss, injury or death involving seismic hazards, as well as expansive soil, liquefaction, and paleontological resources would be less than significant with

mitigation. The proposed project's cumulative impact would be less than significant without mitigation.

Like the proposed project, construction of new residential structures would involve ground-disturbing activities that could increase soil erosion.

Construction of new structures and associated ground-disturbing activities would result in potentially significant impacts similar to the proposed project related to unstable geologic location, expansive soils, and earthquakes, including fault rupture, strong ground shaking, ground failure by liquefaction, and landslides. As such, Alternative 2 would require the incorporation of mitigation measures to reduce these impacts to a less than significant level. However, compliance with the Construction General Permit and implementation of BMPs would reduce erosion and topsoil loss to less than significant levels.

Alternative 2 would connect to already available wastewater and stormwater systems; therefore, no septic tanks or alternative wastewater disposal systems would be installed and no impact related to soil capability of supporting the use of septic tanks or alternative wastewater disposal would occur.

Additionally, Alternative 2 could directly or indirectly disrupt a unique paleontological resource during construction activities associated with the project site include ground-disturbing activities such as grading, trenching, and cutting and filling. Similar to the proposed project, Alternative 2 would be required to incorporate mitigation measures to reduce impacts to a less than significant level. However, due to the reduced ground disturbance associated with the reduction in density, this impact would be less than the proposed project.

Overall, under this alternative, less than significant impacts to Geology, Soils, and Seismicity would occur and impacts would be reduced as compared to the proposed project due to its reduced number of residences.

Greenhouse Gas Emissions

As noted in Section 3.7, Greenhouse Gas Emissions, the proposed project would have a less than significant impact without mitigation incorporated related to conflicting with an adopted GHG-reducing plan, GHG emissions, and cumulative impacts.

The GHG emissions from an individual project do not contribute enough GHG emissions on their own to influence global climate change; thus, the past, present, and future release of GHG emissions is considered a cumulative environmental impact.

Under Alternative 2, construction activities, such as demolition, equipment use, material transport, and worker commutes, would generate both direct and indirect GHG emissions. However, due to the reduced number of units, construction would likely require fewer resources and a shorter timeline, resulting in lower emissions compared to the proposed project.

Under Alternative 2, the project site would include 6 dwelling units (2 existing and 4 new) that would generate ongoing operational GHG emissions, primarily from mobile sources such as vehicle trips.

Although these emissions would be lower than those associated with the proposed project, they would not be eliminated. Once operational, Alternative 2 would need to be consistent with the County's Community Climate Action Plan and meet either Criteria A or B of Bay Area Air District's 2022 GHG significance thresholds to indicate project consistency with applicable GHG plans. As such, Alternative 2, like the proposed project, would therefore have a less significant impact related to GHG; however, due to the reduced number of units, impacts would be reduced as compared to the proposed project.

Hazards and Hazardous Material

As discussed in Section 3.8, Hazards and Hazardous Materials, the proposed project would have no impact related to proximity to a public airport safety hazard. The proposed project's impacts related to hazardous materials upset risk, hazardous emissions proximate to a school, emergency response and evacuation, wildland fires, and cumulative impacts would be less than significant without mitigation. The proposed project's impacts related to the disposal of hazardous materials during excavation and construction from potentially contaminated materials, would be reduced to less than significant levels with mitigation incorporated.

Alternative 2 would be developed on the same project site as the proposed project, which is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Currently, the project site is undeveloped, except for two residential homes and related structures built prior to 1918 and 1966. Asbestos is a concern during demolition of structures that were built prior to 1980 which would be required for the proposed project. Products such as vinyl asbestos tiles, asbestos cement, or other building materials containing asbestos can be expected to occur in buildings constructed prior to the 1970s, when the EPA began to impose bans on certain uses of asbestos. Under Alternative 2, the homes and associated structures would not be demolished and therefore, no impacts related to asbestos-containing materials would occur.

Operationally, the new residential uses are not anticipated to involve the routine use, storage, or disposal of hazardous materials. As such, there would be no impact related to operational hazards.

Overall, Alternative 2 would result in a less than significant impact with regard to hazards and hazardous materials. However, as demolition of existing residences would not occur, no mitigation for construction-related impacts associated with asbestos-containing materials would occur. Therefore, impacts would be reduced as compared to the proposed project.

Hydrology and Water Quality

As noted in Section 3.9, Hydrology and Water Quality, the proposed project's impacts related to surface and groundwater quality during construction and operation, groundwater supply/recharge, risk of pollutant release due to project site inundation, water quality control or sustainable groundwater management plans consistency, erosion/siltation, additional sources of polluted runoff, exceedance of storm drainage capacity resulting in flooding, and impedance of flood flows from alterations to the existing drainage pattern of the site, and cumulative impacts would be less than significant without mitigation.

Although it would introduce fewer impervious surfaces than the proposed project due to reduced building and pavement coverage, Alternative 2 would still be required to implement site-specific BMPs. These include preparing a Storm Water Pollution Prevention Plan (SWPPP) under the Construction General Permit and complying with the County's Phase II Municipal Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit (MRP) during operation. These measures would ensure less than significant impacts related to erosion, runoff, drainage alterations, and water quality.

The project site has no history of hazardous waste; it is not in a Federal Emergency Management Agency (FEMA)-designated flood zone and is not near large water bodies. Residential use associated with operations under this alternative would involve minimal hazardous materials that would affect water quality, and groundwater would not be directly accessed. Thus, impacts would be less than significant related to flood hazard and groundwater management. Overall, this alternative's impact conclusion related to hydrology and water quality would be less than significant and would be similar to the conclusion reached in Section 3.9, Hydrology and Water Quality.

Land Use and Planning

As noted in Section 3.10, Land Use and Planning, the proposed project's impacts related to physically dividing an established community, conflicting with applicable plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect, and cumulative impacts would be less than significant without mitigation.

The Pleasanton General Plan establishes goals and policies related to development, which include goals intended to preserve open spaces, scenic views, community character, and natural features such as hillsides and ridges. Alternative 2 would be developed in accordance with the Alameda County General Plan land use and County's zoning for each parcel on the project site. Therefore, Alternative 2 would not result in conflict with any applicable plans, policies, or regulations.

Alternative 2 would develop fewer dwelling units on the same project site as the proposed project and would not involve annexation or land nor off-site community development. Construction may require underground utility connections beneath nearby roadways, potentially disrupting the public right-of-way. However, any such work would require an encroachment permit from the County. Alternative 2 would not introduce any linear infrastructure that could physically divide an established community. Therefore, impacts related to community division would be less than significant, similar to the proposed project.

Overall, this alternative would have a less than significant impact related to causing a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect and dividing an established community. Therefore, this alternative's impact conclusion would be similar to the conclusion reached in Section 3.10, Land Use and Planning, of the proposed project.

Mineral Resources

As noted in Chapter 4, Effects Found not to be Significant, Section 4.2.2, Mineral Resources, the proposed project would have no impacts related to mineral resources; there would be no cumulative impacts.

No mineral resource zones of regional or statewide importance are located within or adjacent to the project site or are delineated in any local land use plans.[6] Mineral Land Classification map prepared by the DOC indicates that the project site is located in an area of inadequate information to warrant placement in any other mineral resource zone. Furthermore, the project site is currently designated for Low Density Residential (LDR) and Open Space–Agriculture and Grazing (OS–AG) uses by the County and zoned as Agriculture (A) by the County. As such, Alternative 2 would not result in loss of availability of a known mineral resource of value to the region and residents of the State during construction. Therefore, similar to the proposed project, the Alternative 2 would result in no impact related to Mineral Resources would occur.

Noise

As noted in Section 3.11, Noise, the proposed project would have no impact related to exposing people to excessive noise levels within the vicinity of a private airstrip or an airport land use plan or within 2 miles of an airport. The proposed project would have a less than significant impact without mitigation related to substantial noise increase in excess of standards and groundborne vibration and noise levels, and cumulative impacts.

Construction

Like the proposed project, Alternative 2 would include construction activities, such as demolition, equipment uses, material transport, and worker commutes, would generate both direct and indirect noise impacts. However, due to the reduced number of units, construction would likely require fewer resources and a shorter timeline, resulting in an overall reduced construction noise duration compared to the proposed project. Therefore, construction-related noise impacts would be reduced as compared to the proposed project.

Operation

With only a small number of new residences, the increase in ambient noise levels from residential activities for Alternative 2 would be minimal and well below thresholds considered significant for single-family residential development. Additionally, no public improvements such as trails, parking lots, or church access upgrades would occur, further limiting sources of new noise. Furthermore, traffic noise levels would not occur in excess of the County's noise and land use compatibility normally or conditionally acceptable standards for adjacent land uses. Alternative 2 would generate fewer daily vehicle trips than the proposed project, due to the reduced number of residential units. This would result in lower mobile source noise. Stationary sources, such as heating, ventilation, and air conditioning (HVAC) systems, would also be similar or slightly reduced and remain below noise thresholds. Operational noise from residential uses would be typical for rural single-family dwellings,

[6] California Department of Conservation. (DOC). CGS Information Warehouse: Mineral Land Classification Maps. Website: https://maps-cadoc.opendata.arcgis.com/maps/58f2971975cd4fcd98300c7c233d4f99/about. Accessed September 26, 2025.

not exceeding County standards. The project site is not within two miles of a public or private airport, so no airport-related noise impacts would occur. Overall, Alternative 2 would have a further reduced less than significant impact with regards to Noise during both construction and operation in comparison to the proposed project.

Population and Housing

As noted in Chapter 4, Effects Found not to be Significant, Section 4.2.3, Population and Housing, with respect to population growth, housing displacement and cumulative impacts, the proposed project would have a less than significant impact without mitigation.

Alternative 2 would result in the development of 3 new dwelling units and 1 secondary dwelling unit. This would generate approximately 11 new residences, 63 fewer residents than the proposed project.[7] While this alternative would increase population, the development on the project site would be allowed by-right, compliant with the existing zoning district and land use designations. Therefore, development and associated population growth under this alternative was accounted for within the County's General Plan. Additionally, the project site is in an area with rural development with existing utilities and roadways, so no new infrastructure would be needed, avoiding indirect population growth. Further, Alternative 2 preserves the existing housing on-site. Thus, Alternative 2 would reduce direct population growth impacts compared to the proposed project and would have no impact on direct and indirect growth and would not displace existing housing. There would be no impacts to population and housing under Alternative 2.

Public Services

As noted in Section 3.12, Public Services, the proposed project would have no impact on park and recreation facilities. The proposed project would have a less than significant impact without mitigation in regard to fire protection facilities, police protection facilities, school facilities, library facilities, and cumulative impacts.

Alternative 2 would be constructed on the same 130.98-acre site as the proposed project. Through current automatic aid agreements with the Alameda County Fire Department (ACFD) and Livermore-Pleasanton Fire Department (LPFD), the project site would continue to be served by the LPFD. The County Sheriff provides primary law enforcement protection services within unincorporated areas of the County. The Tri-Valley Substation of the Sheriff's Office would be responsible for police services at the proposed project. While the County Sheriff does not have a mutual aid agreement with Pleasanton Police Department (PPD), they do work collaboratively with them during emergency operations. The project site is located within the jurisdiction of the Pleasanton Unified School District (PUSD). The project site would also be served by the Alameda County Library. Alternative 2 implementation would nominally increase demand for fire protection services, police protection services, school services, recreational facilities, and libraries. However, this alternative would be constructed in accordance with applicable County Municipal Code and County General Plan policies and programs that would be subject to County review and approval. Alternative 2 would pay the applicable development impact fees to ensure a proportionate fair share contribution to any future

[7] The City's average persons per household rate was 2.62. 2.62*4=10.48; 2.62*28=73.36.

public facilities needed to serve the County. Moreover, population growth associated with this alternative would be accounted for in the County's General Plan. This alternative would not result in the construction of new or the expansion of existing fire protection facilities, police protection facilities, school facilities, recreational facilities, or other public facilities that would cause significant.

Recreation

As noted in Section 3.13, Recreation, the proposed project would have a less than significant impact without mitigation regarding increased usage of existing parks and recreational facilities, the construction or expansion of recreational facilities, and cumulative impacts.

Alternative 2 would maintain the two existing housing units and develop three new single-family dwelling units and one secondary dwelling unit on the project site. The project site itself does not contain any existing State, regional, or City parks, recreational facilities, or designated open spaces, but the surrounding area is well-served by a variety of recreational resources, including Mount Diablo State Park and 17 City parks and recreational facilities within 3 miles of the site. Alternative 2 would result in fewer on-site residents as compared to the proposed project and would not result in substantial increased demand for parks and recreational facilities. Existing facilities would continue to serve residents on the project site, and no substantial physical deterioration or adverse environmental effects related to recreation would occur due to the limited number of new units.

However, under Alternative 2, the western portion of the project site would not be dedicated to the EBRPD for conservation, and no improvements to the EBRPD trailhead and parking area on the eastern portion of the project site would occur. Therefore, beneficial improvements to the regional parks system and associated recreational facilities would not occur as under the proposed project.

Transportation

As noted in Section 3.14, Transportation, the proposed project's impacts related to roadway safety hazards, emergency access, and bicycle, pedestrian, and transit facilities would be less than significant without mitigation. The proposed project's impacts related to VMT, and cumulative impacts would be significant and unavoidable.

Under Alternative 2, no new on-site roadways, bicycle, or pedestrian facilities, or off-site pedestrian facilities would be constructed, and no hazardous geometric design features, incompatible uses, or features exacerbating inadequate emergency access would be implemented. Though Alternative 2 involves the development of new residences, this incremental increase in population is unlikely to have an effect on Transportation. The project site would continue to be served by the Pleasanton Paratransit Service, Livermore Amador Valley Transit Authority, BART, Altamont Commuter Express (ACE) Rail, and Amtrak, as the site lies in an unincorporated part of Pleasanton. This alternative would result in development of new residential uses that would generate new vehicle trips. As noted in Appendix H, the existing VMT per resident for the existing conditions on the project site in Alameda County currently exceeds the impact threshold. Thus, under Alternative 2, there would still be a significant and unavoidable impact as the existing VMT per resident is anticipated to be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and there would be a nominal increase in VMT generation. Therefore, Alternative 2 would have a less than significant impact

related to roadway safety hazards, emergency access, and bicycle, pedestrian, and transit facilities, but the impacts related to VMT would be significant and unavoidable. This alternative would have a similar level of transportation impacts as the proposed project.

Utilities and Service Systems

As noted in Section 3.15, Utilities and Service Systems, the proposed project's impacts related to water supply or conveyance facilities, wastewater treatment or conveyance facilities, stormwater drainage facilities, natural gas, electric power, telecommunications facilities, landfill capacity, consistency with solid waste regulations, and cumulative impacts would be less than significant without mitigation.

Under this alternative, the project site would continue to be served by the existing utility providers for water, wastewater, stormwater, solid waste, electricity, and telecommunications. The increase in population associated with Alternative 2 would be consistent with the development intensity and population growth assumptions of the County's General Plan. Thus, the nominal increase in population for this alternative would not require the development of new utility facilities and the utility providers are anticipated to have adequate capacity to serve the project site. Therefore, Alternative 2 would have a less than significant impacts related to utilities and service systems, similar to the proposed project. Because of the nominal decrease in demand compared to the proposed project, impacts would be lessened under Alternative 2, but still less than significant, as compared to the proposed project.

Wildfire

As noted in Section 3.16, Wildfire, the proposed project's impacts related to impairment of an emergency response plan or emergency evacuation plan, exposing project occupants to pollutant concentrations from wildfire, installation or maintenance of infrastructure that exacerbates fire risk, and cumulative impacts would be less than significant without mitigation. The proposed project's impacts related to flooding and landslide hazards due to post-fire slope instability or drainage changes would be less than significant with implementation of MM GEO-1.

Alternative 2 would be constructed on the same 130.98-acre project site as the proposed project, which is surrounded by land uses which are largely undeveloped. According to CAL FIRE, the entirety of the project site is located in a High FHSZ within an SRA.[8] Additionally, the City's General Plan Figure 5-1 indicates the project site is within an earthquake-induced landslide zone. As such, this alternative would still require MM GEO-1 to ensure less than significant impacts for slope-related instability risk related to wildfire. Alternative 2 would make an incremental contribution to the less than significant cumulative wildfire hazard impacts and therefore would not be considerable. While development could result in an incremental increase in exposure to wildland fires and associated hazards, Alternative 2, similar to the proposed project, would not exacerbate any existing wildfire hazards. Under Alternative 2, construction and operational related impacts related to wildfire would

[8] California Department of Forestry and Fire Protection (CAL FIRE). Fire Hazard Severity Zone Map Viewer. Website: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones. Accessed September 26, 2025.

be less than significant with mitigation incorporated and reduced as compared to the proposed project due to the reduced unit count and construction.

6.4.2 - Conclusion

Under Alternative 2, the proposed project would not be constructed. Instead, the project site would be redeveloped with up to 5 single-family dwelling units and 1 secondary dwelling unit, as permitted by the County's existing Agricultural zoning. No annexation, public improvements, or dedication of land to the EBRPD would occur, and development would be limited to what is allowed by-right under County regulations. As a result, Alternative 2 would substantially reduce the intensity and scale of development compared to the proposed project. Thus, this alternative would avoid or reduce impacts across a wide range of environmental resource areas, including aesthetics, light and glare, air quality (both construction and operational emissions), biological resources, cultural resources and Tribal cultural resources, energy, geology, soils and seismicity, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use, noise, population and housing, public services, recreation, utilities and service systems, and wildfire, when compared to the proposed project. This alternative would not eliminate the significant and unavoidable impact related to VMT.

However, Alternative 2 would not fully meet all of the proposed project's objectives discussed in Section 6.1.3 above. This alternative would include development on the project site, preserve open space character at the edge of the City, and improve Dublin Canyon Road. However, due to the decreased number of residences, this alternative would not fully promote development of a residential community nor fully utilize the project site development potential. Alternative 2 would not provide open space and connections to Pleasanton Ridge. Accordingly, this alternative would not fully satisfy all of the project objectives

6.5 - Alternative 3—Alternative Site

The Alternative Site Alternative (Alternative 3) would utilize a different project site based on the sites identified in the Site Inventory created for the City of Pleasanton 2023-2031 Housing Element. Alternative 3 would include construction of 28 new detached single-family residential units, which is the same amount of housing units as the proposed project. Operations are anticipated to be the same as the proposed project. As such, Site 26 – St. Augustine (Site 26) from the City's Site Inventory was selected as the alternative site due to its potential to accommodate 28 residential units and the absence of any other entitlement applications submitted for the alternative site.

Site 26 is located at 3949 Bernal Avenue in the City, consisting of APN 946-25500-14-1. This site is vacant and largely undeveloped, with a parking lot in the southeastern corner of the parcel. The approximately 4.2-acre parcel has a General Plan land use designation of Public and Institutional with a Housing Element Overlay, and an A zoning district. Similar to the proposed project, it is assumed this alternative would require rezoning to facilitate development of the proposed residential community. According to the Site Inventory prepared by the City, Site 26 would be able to accommodate between 8 to 29 residential units. The subject area is located on a vacant portion of

property adjacent to the existing St. Augustine Catholic Church site. Other surrounding land uses include medium density residential uses immediately adjacent to the west, north, and south.

Because of its location, Alternative 3 would not implement a new public trailhead, traffic signal, water pump, and road improvements. Additionally, redevelopment of the existing two single-family homes located on the northeastern portion of the project site would remain, and the annexation of the 2.5-acre church site and associated parking lots would not be required.

6.5.1 - Impact Analysis

Aesthetics, Light, and Glare

As noted in Section 3.1, Aesthetics, Light, and Glare, the proposed project's impacts related to scenic vistas, scenic resources, existing visual character, and quality of public views of the site and its surroundings would be less than significant without mitigation. Cumulative impacts would be less than significant without mitigation. Impacts related to aesthetics, light, and glare for the proposed project would be less than significant with implementation of MM AES-4a.

Alternative 3 would be located on Site 26. This alternative would construct 28 residential units, similar to the proposed project. The General Plan recognizes arroyos, ridge views, hillsides, and open space areas as general scenic resources. Scenic resources visible from the project site include hillsides, ridgelines, and open spaces. Views of the Dublin Hillsides to the east and the Mount Diablo Hills to the north are visible from Site 26. However, due to the existing development surrounding the site and its relatively flat nature, these views are intermittent. These scenic resources are primarily part of background views seen at a distance from Site 26. Further, this alternative would adhere to the Municipal Code and all applicable laws and regulations. Thus, Alternative 3 would not have a substantial impact on a scenic vista; impacts would be considered less than significant.

There are no scenic resources identified by the General Plan located on Site 26. Site 26 is not located within or adjacent to an Officially Designated State Scenic Highway or a highway eligible for listing.[9] The closest Officially Designated Highway is Interstate 680, which is located approximately 1.81 miles west of Site 26. Because of distance and existing intervening development, this alternative would not be visible from the scenic route. Thus, no impacts to views of scenic resources from State Scenic Highways would occur.

Site 26 is surrounded by medium density residential development and is located within an urban area. This alternative would include rezoning of the project site to allow for development of 28 residential units. The City would review this alternative to ensure adherence to the Municipal Code and all applicable laws and regulations. Thus, Alternative 3 impacts related to applicable zoning and other regulations governing scenic quality would be less than significant.

Under this alternative, new sources of light and glare would be similar to the proposed project. These include windows and other reflective building materials, and the reflective surfaces of vehicles

[9] California Department of Transportation (Caltrans). 2025. California State Scenic Highway System Map. Website: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed October 14, 2025.

parked and traveling within and around Site 26. Because of the change of Site 26 from vacant to having 28 residential units, there would be an increase in sources of light and glare. As such, this alternative would still require MM AES-4a to ensure that the appropriate design review is conducted to ensure implementation of best practices to mitigate the potential for adverse light and glare. With implementation of MM AES-4a, Alternative 3 would have less than significant impacts related to the addition of light and glare. Therefore, this alternative's impact conclusion would be similar to the conclusion reached in Section 3.1, Aesthetics, Light, and Glare.

Agriculture Resources and Forestry Resources

As noted in Chapter 4, Effects Found not to be Significant, Section 4.2.1, Agriculture Resources and Forestry Resources, the proposed project would have no impacts related to agriculture resources and forestry resources; there would be no cumulative impacts.

The existing Site 26 is vacant and does not contain agricultural or timberland uses. Site 26 is designated as Urban and Built-up Land by the DOC.[10] There is no Prime or Unique Farmland, Farmland of Statewide or Local Importance, forested land, timberland, or timberland production lands located within or adjacent to Site 26. Thus, this alternative would not result in any conversion of agriculture resources or forestry resources into nonagricultural uses. Furthermore, Site 26 is not under a Williamson Act Contract.[11] This alternative would require rezoning, which would remove the existing A zoning district, to facilitate development of the proposed residential community. Following approval of the rezoning, the development of the proposed 28 residential units would be allowed on the vacant site and would not conflict with a zoning district related to agriculture. Therefore, Alternative 3 would have no impact on agriculture and forestry resources. As such, this alternative's impact conclusion would be similar to the conclusion reached in Section 4.2.1, Agriculture Resources and Forestry Resources.

Air Quality

As noted in Section 3.2, Air Quality, the proposed project's impacts related to objectionable odors exposure, cumulative criteria pollutant emissions impacts, sensitive receptors exposure to pollutant concentrations, and cumulative impacts would be less than significant without mitigation. Impacts related to consistency with an air quality management plan would be less than significant with mitigation incorporated.

Construction

Construction of Alternative 3 would result in air quality emissions. Because of similar development intensity as the proposed project, this alternative assumes similar modeled air quality emissions and construction timeline. This would include demolition, ground disturbance, and off-site transport of materials, potentially generating objectionable odors, criteria air pollutants, fugitive dust, and DPM. Odors from exhaust would be temporary and highly diffusive. Additionally, the General Plan would

[10] California Department of Conservation (DOC). 2025. California Important Farmland Finder. Website: https://maps.conservation.ca.gov/DLRP/CIFF/App/#data_s=id%3AdataSource_4-198d2c098b8-layer-4-0%3A550639. Accessed October 3, 2025.

[11] California Department of Conservation (DOC). 2025. Williamson Act Enrollment Finder. Website: https://maps.conservation.ca.gov/dlrp/WilliamsonAct/App/#data_s=id%3Awidget_22_output_config_default_geocode_0_0%3A0. Accessed October 13, 2025.

still require implementation of IM AIR-1 to ensure consistency with applicable 2017 Clean Air Plan measures and to decrease the level of air quality emissions generated during construction. However, Site 26 is immediately adjacent to several sensitive receptors, in the form of single-family homes, to the west, north, and east. As such, construction of 28 residential units on Site 26 would have the potential to increase exposure of pollutant concentrations, such as DPM or TAC, to the adjacent sensitive receptors. Thus, this alternative would result in a potentially significant impact related to exposing sensitive receptors to substantial pollutant concentrations and would require mitigation, reducing impacts to a less than significant level. Therefore, this alternative would increase impacts on construction-related air quality as compared to the conclusion reached in Section 3.2, Air Quality.

Operation

Operation of Alternative 3 would be similar to the proposed project. Because of the proposed residential uses, Alternative 3 would not exceed Bay Area Air District significance thresholds or conflict with the 2017 Clean Air Plan. Therefore, operational air quality impacts would be less than significant without mitigation. Alternative 3 would still contribute to regional nonattainment pollutants. These contributions, however, would remain less than significant without mitigation, consistent with the proposed project.

Objectionable odors are typically associated with industrial or waste-related uses. As Alternative 3 would involve residential development, it would not introduce new objectionable odor sources. Similar to the proposed project, odor impacts would be less than significant without mitigation. Overall, this alternative would have similar impacts related to operational air quality as the conclusion reached in Section 3.2, Air Quality.

Biological Resources

As noted in Section 3.4, Biological Resources, the proposed project would have no impact on an approved Habitat Conservation Plan. The proposed project would have a less than significant impact without mitigation related to fish and wildlife movement corridors. The proposed project would have a less than significant impact with mitigation incorporated related to special-status species, sensitive natural communities or riparian habitat, wetlands and jurisdictional features, local policies or ordinances, and cumulative impacts.

Site 26 is vacant and largely undeveloped. However, it is surrounded by existing development. There are existing trees on Site 26 that would likely require removal for development of 28 residential units. Site 26 does include critical habitat for threatened and endangered species, including California red-legged frog, Alameda whipsnake, San Joaquin kit fox, and migratory birds.[12] As such, there is potential for these species to occur on the Site 26 and development of this alternative would have the potential to impact these species. Thus, this alternative would still require MM BIO-5 for tree removal and MM BIO1b, MM BIO-1c, and MM BIO-1d, and any other species-specific mitigation measures not identified on the proposed project site, such as the San Joaquin kit fox, for special-status species. With implementation of applicable mitigation, impacts related to conflicting with any

[12] United States Fish and Wildlife Service (USFWS). 2025. Information for Planning and Consulting (IPaC), Alameda County, California. Website: https://ipac.ecosphere.fws.gov/location/UQ4YERWWGFE4FIHS5SED3BDAMU/resources. Accessed October 14, 2025.

local policies or ordinances protecting biological resources and special-status species and would be less than significant.

Further, there are no existing wetlands within or adjacent to Site 26.[13] The nearest water body to Site 26 is an unnamed channel approximately 1,500 feet northeast. As such, development on Site 26 would not substantially alter any riparian or wetland species and impacts would be less than significant. Therefore, this alternative's impact conclusion would be slightly reduced compared to the conclusion reached in Section 3.3, Biological Resources. However, impacts would still be less than significant.

Cultural Resources and Tribal Cultural Resources

As noted in Section 3.4, Cultural Resources and Tribal Cultural Resources, the proposed project would have no impact on historical resources. The proposed project would have a less than significant impact, with mitigation incorporated, on human remains, archaeological resources, and cultural resources.

Alternative 3 would result in the development of 28 residential units on an existing, vacant site. There are no existing structures or buildings on Site 26. In the context of CEQA, historic resources refer to the built environment, mainly buildings and structures over 50 years of age that may be eligible for inclusion on the California Register of Historical Resources (CRHR) or National Register of Historic Places (NRHP). Therefore, this alternative would not impact on any historic resources.

Construction would require ground-disturbing activities which could result in the inadvertent discovery of cultural resources, including archaeological resources and human remains. As such, this alternative would still require implementation of MM CUL-2 and MM CUL-3 from the proposed project to mitigate any potential impacts related to cultural resources and Tribal cultural resources. With implementation of MM CUL-2 and MM CUL-3, this alternative would have a less than significant impact related to cultural resources, including archaeological resources and human remains. Therefore, this alternative's impact conclusion would be similar to the conclusion reached in Section 3.4, Cultural Resources and Tribal Cultural Resources.

Energy

As noted in Section 3.5, Energy, the proposed project's impacts related to energy would be less than significant. Alternative 3 would result in the development of 28 residential units on an existing, vacant site. Construction of this alternative would result in an increased demand for energy to power construction equipment. However, construction equipment would be required to comply with regulations, such as the In-use Off-road Airborne Toxic control Measures (ATCM), to minimize emissions by using a modern fleet, keeping equipment well-tuned and limiting idling to 5 minutes or less. Alternative 3 construction would be temporary, limiting the timeline for energy usage. Further, operation for this alternative would require energy usage. The residential units would be designed and constructed in accordance with California Green Building Standards Code (CALGreen) energy efficiency standards of Title 24. Title 24 standards include a broad set of energy conservation

[13] United States Fish and Wildlife Service (USFWS). 2025. National Wetlands Inventory Surface Waters and Wetlands. Website: https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/. Accessed October 14, 2025.

requirements that apply to the structural, mechanical, electrical, and plumbing systems in a building. Additionally, other required elements from CALGreen that would be incorporated include water efficient landscaping, heat reflecting roof membranes, electric vehicle (EV) charging infrastructure and roofing structures to support the installation of solar panels. The residential units would be all-electric in design and therefore would directly decrease reliance on fossil fuels (natural gas). Therefore, construction-related, and operation-related impacts related to electricity, natural gas, and fuel consumption would be less than significant.

Moreover, this alternative would rely on electricity from Pacific Gas and Electric Company (PG&E), with approximately 38 percent of the energy supplied procured from renewable sources, with an additional 49 percent from non GHG-emitting nuclear generation, and 8 percent from large hydroelectric facilities (also non GHG-emitting). Thus, this alternative electricity provider meets the State's current objective of 33 percent renewable energy. Alternative 3 would be required to comply with standards for new construction established by the State and Bay Area Air Quality Management District (BAAQMD) and development standards in the California Energy Code, CALGreen, the Municipal Code, and other applicable federal, State, and local laws. Therefore, this alternative would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Overall, impacts related to energy would be less than significant for this alternative. Therefore, this alternative's impact conclusion would be similar to the conclusion reached in Section 3.5, Energy.

Geology, Soils, and Seismicity

As noted in Section 3.6, Geology, Soils, and Seismicity, the proposed project would have no impact related to the use of septic tanks or alternative wastewater disposal systems. The proposed project's impact related to soil erosion, or the loss of topsoil would be less than significant. The proposed project's impacts related to the risk of loss, injury or death involving seismic hazards, as well as expansive soil, liquefaction, and paleontological resources would be less than significant with mitigation. The proposed project's cumulative impact would be less than significant without mitigation.

Site 26 is relatively flat and located within the City, which is situated in the seismically active San Francisco Bay Area region. However, Site 26 is not located within a designated fault zone, liquefaction zone, or landslide zone which would require additional investigation.[14] According to the USDA, Site 26 consists of Positas gravelly loam.[15] This soil has shrink-swell potential, which can contribute to the potential for subsidence.[16] Because of the characteristics of the soil and potential for earthquakes in the San Francisco Bay Area, a geotechnical report would be needed to determine the quality and integrity of Site 26. This alternative would require MM GEO-1 from the proposed project to ensure impacts would be less than significant.

[14] California Department of Conservation (DOC). 2025. Earthquake Zones of Required Investigation. Website: https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/. Accessed October 13, 2025.

[15] United Stated Department of Agriculture (USDA). 2025. Web Soil Survey. Website: https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx. Accessed October 13, 2025.

[16] United Stated Department of Agriculture (USDA). 2025. Map Unit Description (Brief, Generated) by Soil Survey Area and Major Components. Website: https://www.nrcs.usda.gov/publications/Map%20Unit%20Description%20%28Brief%2C%20Generated%29%20Query%20by%20Soil%20Survey%20Area%20and%20Map%20Unit%20%28All%20Components%29.html. Accessed October 13, 2025.

Additionally, the development of Alternative 3 would still require ground disturbance, which would have the potential to result in inadvertent discovery of paleontological resources. As such, this alternative would still require implementation of MM GEO-2a through MM GEO-2d from the proposed project to mitigate any potential impacts related to cultural resources. Overall, while impacts related to proximity to faults, landslides, and liquefaction would be reduced compared to the proposed project, there is still the potential for impacts related to subsidence and earthquakes. With the implementation of MM GEO-1 and MM GEO-2a through MM GEO-2d, this alternative would have less than significant impact related to geology, soils, and seismicity. Therefore, this alternative's impact conclusion would be similar to the conclusion reached in Section 3.6, Geology, Soils, and Seismicity.

Greenhouse Gas Emissions

As noted in Section 3.7, Greenhouse Gas Emissions, the proposed project would have a less than significant impact without mitigation incorporated related to conflicting with an adopted GHG-reducing plan, GHG emissions, and cumulative impacts.

Alternative 3 would develop the same number of residential uses as the proposed project. As such, the construction timeline and phases for this alternative are assumed to be similar to that of the proposed project. Construction activities, such as demolition, equipment use, material transport, and worker commutes, would generate both direct and indirect GHG emissions. GHG emissions associated with development of the proposed project would occur over the short-term from construction activities, consisting primarily of emissions from equipment exhaust and worker and vendor trips. Therefore, GHG emissions associated with the construction of Alternative 3 would not conflict with any GHG plans or policies and would have a less than significant impact.

Operational emissions for this alternative would result from vehicular traffic within the project vicinity, energy and water usage, and solid waste disposal. This alternative would comply with applicable green building standards, the City's Municipal Code, CALGreen, 2022 Uniform Building Code (UBC), and the City's Model Water Efficient Landscape Ordinance (MWELO). Compliance with these requirements would be consistent with the City's updated Climate Action Plan (CAP 2.0). Thus, GHG emissions associated with Alternative 3 operations would not conflict with any GHG plans or policies and would have a less than significant impact. Therefore, this alternative's impact conclusion would be similar to the conclusion reached in Section 3.7, Greenhouse Gas Emissions.

Hazards and Hazardous Material

As discussed in Section 3.8, Hazards and Hazardous Materials, the proposed project would have no impact related to proximity to a public airport safety hazard. The proposed project's impacts related to hazardous materials upset risk, hazardous emissions proximate to a school, emergency response and evacuation, wildland fires, and cumulative impacts would be less than significant without mitigation. The proposed project's impacts related to the disposal of hazardous materials during excavation and construction from potentially contaminated materials, would be reduced to less than significant levels with mitigation incorporated.

Site 26 is vacant without any existing structures. As such, no demolition of structures would occur as part of Alternative 3. This site is not listed on any hazardous materials databases compiled pursuant to Government Code Section 65962.5.[17,18] Operation of this alternative would not include industrial or retail development that involves hazardous materials such as gas stations, paint stores, or auto parts stores. Unlike industrial or retail facilities, residential development does not involve the type or quantity of hazardous materials that could pose a significant environmental accident. Small quantities of hazardous materials would be used on-site during operation of the proposed project, but not in sufficient quantities to create significant hazard in the unlikely event of upset or accident. These types of materials are common in such residential projects and represent a negligible risk to people and the environment when used as intended and would not be expected to result in the release of hazardous materials into the environment.

The nearest school is Vintage Hills Elementary School, which is located within a quarter mile east of Site 26. However, as noted in the previous paragraph, Alternative 3 operations are not anticipated to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. Site 26 is not located within an airport land use plan or within 2 miles of a public airport. The nearest airport is the Livermore Municipal Airport, located approximately t3hree miles northeast of Site 26. Thus, no impact related to exposure of people to safety hazards or excessive noise in proximity to an airport would occur. Refer to the wildfire discussion in Section 6.5.1, Impact Analysis, below for a discussion of the less than significant impacts for Alternative 3 related to impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan and wildland fire risks.

Overall, this alternative would not require mitigation for hazards and hazardous resources as all impacts are anticipated to be less than significant. Therefore, this alternative's impact conclusion would be reduced compared to the conclusion reached in Section 3.8, Hazards and Hazardous Materials.

Hydrology and Water Quality

As noted in Section 3.9, Hydrology and Water Quality, the proposed project's impacts related to surface and groundwater quality during construction and operation, groundwater supply/recharge, risk of pollutant release due to project site inundation, water quality control or sustainable groundwater management plans consistency, erosion/siltation, additional sources of polluted runoff, exceedance of storm drainage capacity resulting in flooding, and impedance of flood flows from alterations to the existing drainage pattern of the site, and cumulative impacts would be less than significant without mitigation.

Site 26 is currently vacant, and a majority of the site is impervious. As such, development of this alternative would introduce new pervious surfaces, similar to the proposed project. Alternative 3 would still be required to implement site-specific BMPs. These include preparing a SWPPP under the

[17] California State Water Resources Control Board (State Water Board). GeoTracker. Website: https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=3949+bernal+avenue+pleasanton. Accessed October 14, 2025.

[18] California Department of Toxic Substances Control (DTSC). EnviroStor Map. Website: https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=3949+bernal+avenue+pleasanton. Accessed October 14, 2025.

Construction General Permit which is required pursuant to Chapter 9.14 of the City's Municipal Code. Additionally, Alternative 3 would require construction of new stormwater infrastructure, similar to the proposed project, to adequately serve the 28 residential units. Given the similar intensity of development to the proposed project, Alternative 3 would not exceed storm drain capacity or increase surface runoff. These measures and design features would ensure less than significant impacts related to erosion, runoff, drainage alterations, and water quality.

According to FEMA, Site 26 is located within Zone X, an area of Minimal Flood Hazard.[19] The 2021 Alameda County Local Hazard Mitigation Plan indicates that the project site is not at risk of being inundated by a tsunami, or a dam breach.[20] Residential use would involve minimal hazardous materials, and groundwater would not be directly accessed. Instead, water would still be supplied by the City and Zone 7. Therefore, impacts would be less than significant related to flood hazard, inundation risk, and groundwater management. Overall, this alternative's impact conclusion would be similar to the conclusion reached in Section 3.9, Hydrology and Water Quality.

Land Use and Planning

As noted in Section 3.10, Land Use and Planning, the proposed project's impacts related to physically dividing an established community, conflicting with applicable plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect, and cumulative impacts would be less than significant without mitigation.

Site 26 is currently vacant and does not provide direct access to the existing surrounding residential development. This alternative would develop 28 residential units and would not include the removal of existing access to Site 26. Alternative 3 would not involve the construction of a large linear feature, such as a railroad or interstate highway, which would have the potential to impact mobility of an existing community. As such, implementation of Alternative 3 would not divide an established community.

Alternative 3 would not require annexation into the City. Unlike the proposed project, this alternative would be located in an area developed with surrounding medium density residential uses. This alternative would include rezoning to alter the existing zoning district to facilitate development of the 28 residential units. Further, the Housing Element Overlay would allow Alternative 3 to be consistent with widely accepted planning principles of facilitating logical and orderly growth, ensuring compatibility with surrounding uses, and ensuring consistency with the goals and policies of the General Plan. When a project entails an amendment to zoning, inconsistency with the existing zoning is an element of the project itself, which then necessitates a legislative policy decision by the agency and does not signify a potential environmental effect. As such, if approved, the proposed rezoning would serve as a self-mitigating aspect of the proposed project that would serve to correct conflicts that would otherwise exist. Thus, this alternative would have a less than significant impact related to causing a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or

[19] Federal Emergency Management Agency (FEMA). 2025. Flood Map Service Center: 06001C0338G, effective on 8/3/2009. Website: https://msc.fema.gov/portal/search?AddressQuery=3949%20bernal%20avenue%20pleasnaton%20ca. Accessed October 14, 2025.
[20] Alameda County. 2022. 2021 Alameda County Local Hazard Mitigation Plan. March.

mitigating an environmental effect. Therefore, this alternative's impact conclusion would be similar to the conclusion reached in Section 3.10, Land Use and Planning.

Mineral Resources

As noted in Chapter 4, Effects Found not to be Significant, Section 4.2.2, Mineral Resources, the proposed project would have no impacts related to mineral resources; there would be no cumulative impacts.

There are no mineral resource or recovery sites on or near Site 26.[21] A Mineral Land Classification map prepared by the DOC indicates that the project site is located in an area of inadequate information to warrant placement in any other mineral resource zone.[22] As such, this alternative would not result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the State. Furthermore, Site 26 has a land use designation of Public and Institutional, and A zoning district. There is no General Plan-designated mineral resource on Site 26. Therefore, implementation of Alternative 3 would not result in the loss of a locally important mineral resource recovery site delineated by an applicable land use plan. Alternative 3 would have no impact on mineral resources. Thus, this alternative's impact conclusion would be similar to the conclusion reached in Section 4.2.2, Mineral Resources.

Noise

As noted in Section 3.11, Noise, the proposed project would have no impact related to exposing people to excessive noise levels within the vicinity of a private airstrip or an airport land use plan or within 2 miles of an airport. The proposed project would have a less than significant impact without mitigation related to substantial noise increase in excess of standards and groundborne vibration and noise levels, and cumulative impacts.

Construction

Construction of Alternative 3 would result in temporary noise and vibration emissions. Because of similar development intensity as the proposed project, this alternative assumes similar modeled noise and vibration emissions, along with the construction timeline. The closest sensitive receptors to Site 26 are the residential uses that are located immediately adjacent to the west, north, and east. There are a greater number of sensitive receptors that are located closer to construction activities than at the proposed project site, which would result in increased noise and vibration levels measured from these receptors. Thus, this alternative would result in a potentially significant impact related to exposing sensitive receptors to substantial temporary increase in ambient noise and excessive groundborne vibration. Alternative 3 would require mitigation to reduce impacts to a less than significant level, such as equipment silencers. Therefore, this alternative would increase impacts on construction-related noise and vibration emission as compared to the conclusion reached in Section 3.11, Noise.

[21] California Division of Mines and Geology (CDMG). 1982. Mineral Land Classification Map for Alameda and Contra Costa Counties. Website: https://maps.conservation.ca.gov/cgs/minerals/?page=All-Data#data_s=id%3AdataSource_335-18a47b5b8e5-layer-10-192c08351d6-layer-28%3A20. Accessed October 13, 2025.

[22] Ibid.

Operation

Operation of Alternative 3 would be similar to the proposed project. Stationary sources, such as heating, ventilation, and HVAC systems, would also be similar to the proposed project and remain below noise thresholds. Primary access to Site 26 is anticipated to occur from the existing paved roadway to the south. Mobile source noise would occur in the form of daily vehicle trips, which would be a similar amount as the proposed project due to the similar number of residential units. However, the nearby residential units are not connected by a road and, as such, daily trips would not be expected to occur in that direction. Therefore, impacts related to operational noise and vibration emissions would be less than significant.

Moreover, Site 26 is not within two miles of a public or private airport, so no airport-related noise impacts would occur. Overall, this alternative would have impacts on operational noise and vibration emission as the conclusion reached in Section 3.11, Noise.

Population and Housing

As noted in Chapter 4, Effects Found not to be Significant, Section 4.2.3, Population and Housing, with respect to population growth, housing displacement and cumulative impacts, the proposed project would have a less than significant impact without mitigation.

Site 26 is currently vacant with no existing residences. Alternative 3 would include the construction of 28 residential units. Site 26 was evaluated in the City of Pleasanton 2023–2031 (6th Cycle) Housing Element Update (Housing Element Update) and associated Housing Element Update Program EIR. The Housing Element Update was adopted on January 20, 2023, and further revised in August 2023. The Housing Element Update proposed to re-zone Site 26 to allow for a maximum of 29 residential units. Therefore, the Housing Element Update assumed the project site could be developed with 28 dwelling units to support the City in meeting its Regional Housing Needs Assessment (RHNA) requirements. Furthermore, the population of the City has declined since 2019. Therefore, Alternative 3 would not displace any individuals or significantly increase population and less than significant impacts related to population and housing would occur. This alternative's impact conclusion would be similar to the conclusion reached in Section 4.2.3, Population and Housing.

Public Services

As noted in Section 3.12, Public Services, the proposed project would have no impact on park and recreation facilities. The proposed project would have a less than significant impact without mitigation in regard to fire protection facilities, police protection facilities, school facilities, library facilities, and cumulative impacts.

Site 26 is served by ACFD for fire services, PPD for police services, and PUSD for schools. The nearest library is the City of Pleasanton Library located approximately 5,258 feet west of Site 26, and the nearest park is Kottinger Community Park located approximately 319 feet northeast of Site 26. Alternative 3 would develop the same amount of residential units as the proposed project and, in turn, would involve the same increase in demand. This alternative would nominally increase demand for fire protection services; the proposed project would be constructed in accordance with applicable Municipal Code and General Plan policies and programs and would be subject to City

review and approval. While this alternative would not include open space, the City is fulfilling its acres of parkland to population goal. Even with the increase of residents generated by this alternative, the City would still meet its goal of 5 acres of parkland per 1,000 residents. Additionally, in compliance with General Plan Program 2.1, proposed development would be required to pay the applicable development impact fees to ensure a proportionate fair share contribution toward any future public facilities needed to serve the City. Therefore, Alternative 3 would have a less than significant impact related to public services. This alternative's impact conclusion would be similar to the conclusion reached in Section 3.12, Public Services.

Recreation

As noted in Section 3.13, Recreation, the proposed project would have a less than significant impact without mitigation regarding increased usage of existing parks and recreational facilities, the construction or expansion of recreational facilities, and cumulative impacts.

Alternative 3 would not include the development of open space or recreational facilities. While this alternative would not include recreational space and would increase population, the City is currently fulfilling its acres of parkland to population goal. Even with the increase of residents generated by this alternative, the City would still meet its goal of 5 acres of parkland per 1,000 residents. Additionally, in compliance with General Plan Program 2.1, proposed development would be required to pay the applicable development impact fees to ensure a proportionate fair share contribution toward any future recreation facilities needed to serve the City. Therefore, Alternative 3 would have a less than significant impact related to recreation. This alternative's impact conclusion would be similar to the conclusion reached in Section 3.13, Recreation.

However, under Alternative 3, no land would be dedicated to the EBRPD for conservation, and no improvements to the EBRPD trailhead and parking area on the eastern portion of the project site would occur. Therefore, beneficial improvements to the regional parks system and associated recreational facilities would not occur as under the proposed project.

Transportation

As noted in Section 3.14, Transportation, the proposed project's impacts related to roadway safety hazards, emergency access, and bicycle, pedestrian, and transit facilities would be less than significant without mitigation. The proposed project's impacts related to VMT, and cumulative impacts would be significant and unavoidable.

For this alternative to not conflict with a program plan, ordinance, or policy of the circulation system, this alternative would have to demonstrate compliance and implement design features consistent with those provisions in the General Plan. Any pedestrian, bicyclist, and roadway development occurring as part of Alternative 3 would be reviewed by the City for consistency with applicable policies. As such, Alternative 3 would likely have a similar impact compared to the proposed project and would be less than significant in conflicting with a program plan, ordinance, or policy of the circulation system.

Alternative 3 would generate VMT similar to the proposed project. As such, this alternative would result in a level of VMT per capita that would exceed the threshold of 15 percent below Alameda County's average. This alternative would need to incorporate feasible VMT reduction strategies. However, the strategies would likely not achieve the necessary reduction in VMT per capita. This would be consistent with the conclusions of the certified Housing Element EIR, and no feasible mitigation measures exist to further reduce VMT. Impacts would be significant and unavoidable.

Potential transportation hazards could arise from poor design, incompatible uses, or inadequate emergency access. However, Alternative 3 would be required to follow circulation design standards in the General Plan and comply with California Fire Code requirements for emergency access. These measures would ensure impacts remain less than significant.

Overall, Alternative 3's impacts related to conflicting with a program or policy of the circulation system, and increasing hazards due to a geometric design feature, or inadequate emergency access would be less than significant, while impacts related to VMT would be significant and unavoidable. Therefore, this alternative's impact conclusion would be similar to the conclusion reached in Section 3.14, Transportation.

Utilities and Service Systems

As noted in Section 3.15, Utilities and Service Systems, the proposed project's impacts related to water supply or conveyance facilities, wastewater treatment or conveyance facilities, stormwater drainage facilities, natural gas, electric power, telecommunications facilities, landfill capacity, consistency with solid waste regulations, and cumulative impacts would be less than significant without mitigation.

Alternative 3 would develop 28 residential units on Site 26. The site is currently vacant and largely undeveloped. As such, this alternative would require the development of new utility infrastructure within Site 26. However, due to the developed uses surrounding Site 26, it is anticipated that this infrastructure would connect to existing utility infrastructure, including water, wastewater treatment, and solid waste disposal. Further, this alternative would result in the same increase in population as the proposed project. As previously mentioned in Section 3.15, Utilities and Service Systems, wastewater, recycled water, and solid waste providers would have adequate capacity to serve the proposed project, and the City would have adequate water supplies would be available to serve the project reasonably foreseeable future development during normal, dry and multiple dry years. Since Alternative 3 would have a similar number of residents and demand increase, impacts would be less than significant. Therefore, this alternative's impact conclusion would be similar to the conclusion reached in Section 3.15, Utilities and Service Systems.

Wildfire

As noted in Section 3.16, Wildfire, the proposed project's impacts related to impairment of an emergency response plan or emergency evacuation plan, exposing project occupants to pollutant concentrations from wildfire, installation or maintenance of infrastructure that exacerbates fire risk, and cumulative impacts would be less than significant without mitigation. The proposed project's

impacts related to flooding and landslide hazards due to post-fire slope instability or drainage changes would be less than significant with implementation of MM GEO-1.

Site 26 is not located within a Very High FHSZ.[23] The surrounding land is developed with residential uses, roadway infrastructure, and a church. The proposed residential units would be constructed in compliance with the California Fire Code with regard to access and building materials such as tile or other fire-resistant roofing. The City has in place several emergency plans regarding public safety and emergency evacuations, including the General Plan Safety Element, Emergency Management Plan (EMP), and Local Hazard Mitigation Plan (LHMP). This alternative is anticipated to be adequately served by existing police and fire services. Alternative 3 would include connections to existing roadways and access would be designed in accordance with the City's Standards and Specifications guidebook to accommodate large emergency vehicles such as fire engines. Thus, this alternative would have a less than significant impact related to wildfire risk and impairment to an adopted emergency response plan or emergency evacuation plan. Therefore, this alternative's impact conclusion would be reduced compared to the conclusion reached in Section 3.16, Wildfire, due to Site 26's location outside of a Very High FHSZ.

6.5.2 - Conclusion

Alternative 3 would not result in an impact related to agriculture resources and forestry resources and mineral resources, similar to the proposed project. This alternative would result in similar impacts to the proposed project's less than significant impacts associated with aesthetics, light, and glare; cultural resources; energy; geology, soils, and seismicity; greenhouse gas emissions; hydrology and water quality; land use and planning; population and housing; public services; recreation; Tribal cultural resources; and utilities and service systems. Like the proposed project, this alternative would also result in the significant and unavoidable impacts related to VMT as development of the 28 single-family residential units would be maintained.

Alternative 3 would reduce impacts related to wildfire and hazards and hazardous materials. Specifically, Alternative 3 would not include demolition of existing structures that could contain hazardous materials, such as asbestos and lead paint. Thus, MM HAZ-1 would no longer be required to achieve less than significant impacts related to creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Further, Site 26 is not located within a Very High FHSZ or a landslide investigation zone. As such, Alternative 3 would not require MM GEO-1 to achieve a less than significant impact related to exposing people or structures to significant risks, including downslope or downstream flooding or landslides.

Alternative 3 would result in increased impacts related to air quality and noise when compared to the proposed project. Site 26 is immediately adjacent to sensitive receptors, in the form of residences, to the east, north, and west. The increased number and decreased proximity of sensitive receptors could result in a potentially significant impact on construction-related air quality, noise,

[23] California Department of Forestry and Fire Protection (CAL FIRE). 2025. Find your Fire Hazard Severity Zone (FHSZ) and local public contacts. Website: https://experience.arcgis.com/experience/5065c998b4b0462f9ec3c6c226c610a9. Accessed October 14, 2025.

and vibration emissions. Thus, new mitigation measures would need to be incorporated to mitigate the potentially significant impact to a less than significant level.

Moreover, there would be changes in impacts to biological resources compared to the proposed project. Site 26 would not contain wetlands, or riparian and aquatic habitat. Because of the absence of this habitat on the site for Alternative 3, MM BIO-3 would not be required to reduce impacts to a less than significant level. Additionally, due to the difference in location between the proposed project site and Site 26, the types of species present would have the potential to differ. A thorough review from a qualified biologist would be required to identify the endangered or threatened species that would occur on Site 26 and recommend the applicable mitigation for each species. Thus, this alternative would result in new or altered mitigation for special-status species compared to the proposed project.

Furthermore, this alternative would not fully meet all the project objectives outlined in Section 6.2 above. Alternative 3 would not provide open space areas across the project site and dedicate land to the EBRPD to be permanently preserved, provide public access, including a public parking/staging area and a trail connection, to Pleasanton Ridge, nor improve Dublin Canyon Road to increase access and safety by constructing roadways, sidewalks, and bike lanes. In addition to this, the project applicant does not currently own Site 26 and would need to acquire the property in order to develop this alternative.

6.6 - Environmentally Superior Alternative

CEQA Guidelines Section 15126(e)(2) requires identification of an environmentally superior alternative. If the No Project Alternative is environmentally superior, CEQA requires selection of the "environmentally superior alternative other than the No Project Alternative" from among the project and the alternatives evaluated.

The qualitative environmental effects of each alternative in relation to the proposed project are summarized in Table 6-1.

Table 6-1: Summary of Alternatives

Environmental Topic Area	Proposed Project	Alternative 1: No Project	Alternative 2: No Project- Existing Zoning	Alternative 3: Alternative Site
Aesthetics, Light, and Glare	LTSM	NI <	LTSM =	LTSM =
Agriculture Resources and Forestry Resources	NI	NI =	NI =	NI =
Air Quality	LTS	LTS <	LTS <	LTSM >
Biological Resources	LTSM	LTS <	LTSM <	LTSM <
Cultural Resources	LTSM	NI <	LTSM <	LTSM =
Energy	LTS	LTS <	LTS <	LTS =

Environmental Topic Area	Proposed Project	Alternative 1: No Project	Alternative 2: No Project- Existing Zoning	Alternative 3: Alternative Site
Geology, Soils, and Seismicity	LTSM	NI <	LTSM <	LTSM =
Greenhouse Gas Emissions	LTS	LTS <	LTS <	LTS =
Hazards and Hazardous Materials	LTSM	NI <	LTS <	LTS <
Hydrology and Water Quality	LTS	NI <	LTS <	LTS =
Mineral Resources	NI	NI =	NI =	NI =
Land Use	LTS	NI <	LTS <	LTS <
Noise	LTS	NI <	LTS <	LTSM >
Population and Housing	LTS	NI <	NI <	LTS =
Public Services	LTS	NI <	LTS <	LTS =
Recreation	LTS	NI <	LTS <	LTS =
Transportation	SU	SU <	SU =	SU =
Tribal Cultural Resources	LTSM	NI <	LTSM <	LTSM =
Utilities	LTS	NI <	LTS <	LTS =
Wildfire	LTSM	NI <	LTSM <	LTS <
Source: FirstCarbon Solutions (FCS) 2025.				

CEQA Guidelines Section 15126(e)(2) requires an EIR to identify an environmentally superior alternative. The No Project Alternative would have reduced impacts for a majority of categories. Thus, the No Project Alternative would be the environmentally superior alternative. Since the No Project Alternative is the environmentally superior alternative, the EIR must also identify an environmentally superior alternative from among the other alternatives.

The No Project, Existing Zoning Alternative (Alternative 2) would be the second environmentally superior alternative because it would reduce impacts related to a majority of environmental resources, including air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, Tribal cultural resources, utilities and service systems, and wildfire due to the development intensity. This alternative would not eliminate the significant and unavoidable impact related to VMT.

Additionally, Alternative 2 would also meet some of the proposed project objectives to a certain degree by providing 6 dwelling units, encouraging development on the project site, preserving open space character at the edge of the City, and improving Dublin Canyon Road. However, due to the decreased number of residences, this alternative would not fully promote development of a residential community nor fully utilize the project site development potential. Alternative 2 would

not provide open space and connections to Pleasanton Ridge. Accordingly, this alternative would not fully satisfy all of the project objective.

6.7 - Alternatives Rejected From Further Consideration

CEQA Guidelines Section 15126.6(c) requires an EIR to identify any alternatives that were considered but rejected as infeasible during the scoping process and explain the reasons for rejection of those alternatives. Factors that may be used to eliminate alternatives from detailed consideration include (i) failure to meet most of the basic project objectives, (ii) infeasibility taking into account economic, environmental, social, technological, and legal factors, or (iii) inability to substantially lessen or avoid significant environmental impacts of the proposed project. The following alternative was initially considered but rejected from further consideration for reasons described below.

Site 27 Alternative

An alternative that would implement development of the proposed project on another alternative project site, Site 27 (PUSD), was considered. Site 27 was located on Vineyard Avenue, between Thiessen Street and Manoir Lane, within the City and had similar rural character to the project site. However, entitlements for a different development application have since occurred on Site 27 that would bar it from being utilized as an alternative site. Additionally, this alternative would not fully meet project objectives related to preserving open space, connecting to EBRPD trails, and improving Dublin Canyon Road. Therefore, the Site 27 Alternative was deemed infeasible.

CHAPTER 7: PERSONS AND ORGANIZATIONS CONSULTED/LIST OF PREPARERS

7.1 - Lead Agency

7.1.1 - City of Pleasanton

Planning Division

Planning Manager..... Ellen Clark
Associate Planner .....Natalie Amos

Pleasanton Unified School District

Superintendent.....David Haglund
Administrative Assistant .....Janet Wolfinger

Operation Services Department

Park Maintenance Superintendent..... Brandon Stewart

Library Services

Director of Library and Recreation .....Heidi Humphry

7.1.2 - Public Agencies

State Agencies

Native American Heritage Commission

Staff Service Analyst .....Andrew Green

7.2 - List of Preparers

7.2.1 - Project Applicant

Ponderosa Homes II, Inc.

Applicant Developer ..... Jeff Schroeder

7.2.2 - Lead Consultant

FirstCarbon Solutions

Project Director .....Mary Bean
Senior Project Manager.....Prathna Maharaj, AICP
Legal Counsel..... Megan Starr, JD
Director of Cultural Resources..... Dana DePietro, PhD, RPA
Senior Biologist.....Robert Carroll
Director of Noise and Air Quality ..... Phil Ault, LEED® AP

Environmental Associate ..... Laura Campion
Environmental Analyst ..... Henry Welch
Environmental Analyst ..... Alex Ortiz
Environmental Analyst ..... Stephanie Shepard
Air Quality Analyst ..... Jackie Winkel
Biological Resource Analyst ..... Kelly Evans
Senior Managing Editor ..... Susie Harris
Publications Manager ..... Alec Harris
Technical Editor ..... Sarah Vine
Technical Document Manager ..... Melissa Ramirez
GIS/Graphics ..... Karlee McCracken
GIS/Graphics ..... Sebastian Macias

7.2.3 - Technical Subconsultants

Ninyo & Moore

Principal Engineering Geologist ..... David C. Seymour, PG, CEG

TJKM

Vice President ..... Chris Kinzel

Balance Hydrologics

Civil Engineer ..... Ed Ballman, PE